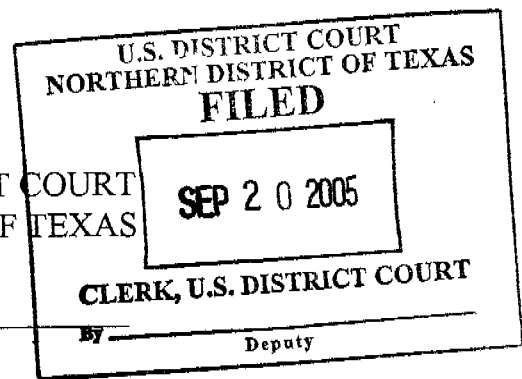


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

RAKESH JYOTI SARAN (1)

also known as, "Johar Rakesh Saran,"

"Johar Saran," "Joe Saran,"

"John Saran," and "Imraan Siddiqi"

STACY FRED WORD (2)

also known as, "Fred Word"

DAVID KAISER (3)

LESLIE WAYNE DAVIDOFF (4)

also known as, "Les Davidoff"

CHERIE ANN WORD (5)

AYESHA SIDDIQUI (6)

also known as, "Ayesha Siddiqi"

MARGIE MOLINA (7)

GEORGE SCHMIDT (8)

MATTHEW FRED VALDEZ (9)

LEVOIE WAYNE BRANAM (10)

SAMEER A. SAYED (11)

WINSTON ANTHONY WILLIAMS (12)

ARRON KYLE WOODCOCK (13)

HEATHER RACHELLE ELLIOTT (14)

DAVID THANE MUNS (15)

GASTON BLANCHET, JR. (16)

SHERMAN TED SOLOMON (17)

STEVEN ROSNER (18)

GIL LOZANO (19)

ALLIANCE PHARMACY SERVICES, INC. (20)

AMS PHARMACEUTICALS GROUP, INC. (21)

CARRINGTON HEALTH CARE SYSTEM, INC. (22)

DALAMAR SERVICES, INC. (23)

No. 305 - CR - 0240P

EAST POINTE PHARMACY SERVICES, INC. (24)	§
EVEREST SERVICES, INC. (25)	§
INFINITI SERVICES GROUP, INC. (26)	§
MED-CARE INFUSION SERVICES, INC. (27)	§
NATIONAL EXECUTIVE MANAGEMENT, INC. (28)	§
ORION PHARMACY SERVICES, INC. (29)	§
PRECISION PHARMACY SERVICES, INC. (30)	§
PREMIUM PHARMACY SERVICES, INC. (31)	§
QUANTUM INFUSION, INC. (32)	§
RELIANCE PHARMACEUTICAL, INC. (33)	§
SOUTHWEST INFUSION, INC. (34)	§
SWS PHARMACY SERVICES, INC. (35)	§
TEXAS HOME INFUSION, L.L.C. (36)	§
TRI-PHASIC PHARMACY, INC. (37)	§
TRINITY INFUSION SERVICES, INC. (38)	§
TRINITY PHARMACY SERVICES, INC. (39)	§

INDICTMENT

The Grand Jury Charges:

Introduction

At all times material to the allegations set forth in this indictment:

1. **Rakesh Jyoti Saran**, also known as Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi (**Saran**), owned 51% of **Carrington Healthcare Systems, Inc. (Carrington)**, a Texas corporation on or about October 1, 1999. **Saran's** wife owned 49% of **Carrington**.

2. **Saran** owned and operated **Infiniti Services Group, Inc. (Infiniti)**, a Texas corporation on or about November 11, 2004.

3. **Saran** operated **National Executive Management, Inc. (National)**, a Texas corporation on or about November 11, 2004. **Saran, Cherie Ann Word (Cherie**

Word), and **Stacy Fred Word (Fred Word)** were directors. **Fred Word** was the Chief Financial Officer (CFO).

4. Pharmacies dispensing controlled substances required registration with the Drug Enforcement Administration (DEA). A separate registration was required for each principal place of business where controlled substances were distributed or dispensed.

5. A DEA registered pharmacy could engage in activities only as authorized by the state where the pharmacy was located.

The Pharmacies:

6. Through **Carrington** and **Infiniti**, **Saran** operated 23 pharmacies, all incorporated in the state of Texas:

(1) **Alliance Pharmacy Services Inc. (Alliance)** obtained a DEA retail pharmacy registration on May 3, 2002, for 1904 Industrial Court #103, Colleyville, Texas. **David Kaiser** was the president, director, and co-owner with **Saran**. **Fred Word** was the CFO. The DEA registration expired on June 20, 2005. Alliance also operated from an unregistered warehouse at 1223 E. Corporate Drive, Arlington, Texas.

(2) **AMS Pharmaceuticals Group Inc. (AMS)** obtained a DEA retail pharmacy registration on July 18, 2000, for 301 East Stephens St. #100, Arlington, Texas (Stephens warehouse). **Saran** was the president, **Fred Word** was the CFO, and **Saran's** wife was a director. AMS also operated from an unregistered address 1700 Tech Centre Parkway #110, Arlington, Texas (Tech Centre warehouse).

(3) **Anchor Services Inc.** obtained a DEA retail pharmacy registration on February 18, 2004, for 7471 Airport Freeway, Fort Worth, Texas.

(4) **Avatar Services Inc.** obtained a DEA retail pharmacy registration on June 30, 2004, for 2129 S. Great SW Pkwy #304, Grand Prairie, Texas.

(5) **Collective Services Inc. (Collective)** obtained a DEA retail pharmacy registration on June 13, 2003, for 2435 Gravel Dr., Fort Worth, Texas. **Saran, Fred Word, Cherie Word** each owned 33.3% of **Collective**.

(6) **Dalamar Services Inc. (Dalamar)** obtained a DEA retail pharmacy registration on April 4, 2003, for 1285 N. Main Street #A-102, Mansfield, Texas, and on October 20, 2004, for 1315 FM 1187 #113B, Mansfield, Texas (Mansfield warehouse). **Saran and Cherie Word** were co-owners.

(7) **East Pointe Pharmacy Services Inc. (East Pointe)** obtained a DEA retail pharmacy registration on June 25, 2001, for 2100 North Highway 360 #1001, Grand Prairie, Texas. **East Pointe's** DEA registration expired on August 31, 2004. **Fred Word** was the CFO, **Ayesha Siddiqui**, also known as Ayesha Siddiqi, was the president and a 37% owner, and **Saran** owned 25%.

(8) **Everest Services Inc. (Everest)** obtained a DEA retail pharmacy registration on April 30, 2004, for 2812 S E Loop 820 Bldg 5A, Fort Worth, Texas.

(9) **Med-Care Infusion Services Inc. (Med-Care)** obtained a DEA retail pharmacy registration on January 16, 2003, for 1126 S. Cedar Ridge #123-A1,

Duncanville, Texas (Duncanville warehouse). **Saran** and **Fred Word** were directors.

(10) **Omni-Care Health Services Inc. (Omni)** obtained a DEA retail pharmacy registration on December 16, 2003, for 2100 North Highway 360 #1001, Grand Prairie, Texas. **Siddiqui** was a director.

(11) **Orion Pharmacy Services Inc. (Orion)** obtained a DEA retail pharmacy registration on April 4, 2003, for the Duncanville warehouse. **Saran** and **Fred Word** were co-owners.

(12) **P-One Services Inc. (P-One)** obtained a DEA retail pharmacy registration on October 17, 2002, for 445 W. Mansfield Hwy, Ste B, Kennedale, Texas. The DEA registration expired on March 31, 2005. **David Thane Muns** was the vice-president, a director, and a 33.3% owner with **Saran**.

(13) **Paradigm Pharmacy Services Inc. (Paradigm)** obtained a DEA retail pharmacy registration on January 16, 2003, for 8200 Northeast Pkwy #115, N. Richland Hills, Texas.

(14) **Precision Pharmacy Services Inc. (Precision)** obtained a DEA retail pharmacy registration on June 14, 2001, for the Stephens warehouse, and on October 20, 2004, for the Mansfield warehouse. **Fred Word** was the CFO, **Cherie Word** was the president and co-owner with vice-president **Saran**.

(15) **Premium Pharmacy Services Inc. (Premium)** obtained a DEA retail pharmacy registration on October 17, 2002, for 7707 Sand Street Bldg 11, Fort

Worth, Texas. The DEA registration expired on February 17, 2005. **Fred Word** was the CFO, and **Saran** owned 50% of the company.

(16) **Quantum Infusion Inc. (Quantum)** obtained a DEA retail pharmacy registration on January 17, 2003, for 1285 N Main Street #102-A, Mansfield, Texas, and on October 28, 2004, for the Mansfield warehouse. **Cherie Word** was president, and **Saran** was a director.

(17) **Reliance Pharmaceutical Inc. (Reliance)** obtained DEA retail pharmacy registration on October 17, 2002, for 1107-B S Airport Circle, Euless, Texas. The DEA registration expired on March 31, 2005. **Siddiqui** was the secretary-treasurer, **Fred Word** was the CFO, and **Saran** owned 25%.

(18) **Southwest Infusion Inc.**, sometimes referred to as **Southwest Home Infusion, (Southwest)** obtained a DEA retail pharmacy registration on September 7, 2001, for the Stephens warehouse. **Saran's** wife was the president and owned 100% of the company. **Fred Word** was the CFO. On or about February 1, 2005, **Southwest** physically relocated to the Tech Centre warehouse.

(19) **SWS Pharmacy Services Inc. (SWS)** obtained a DEA retail pharmacy registration on June 14, 2001, for the Duncanville warehouse. **Fred Word** was the president and director and **Saran** was the Vice President and director. On or about 2003, **Saran** and **Fred Word** were co-owners.

(20) **Texas Home Infusion LLC (Texas Home)** obtained a DEA retail

pharmacy registration on June 14, 2001, for 4300 Beltway Place #125, Arlington, Texas.

George Schmidt was president, **Cherie Word** was a director, and **Fred Word** was the CFO. **Saran** owned 50% of the company.

(21) **Tri-Phasic Pharmacy Inc. (Tri-Phasic)** obtained a DEA retail pharmacy registration on April 4, 2003, for the Stephens warehouse. **Margie Molina** was the president and a director. On or about February 1, 2005, **Tri-Phasic** physically relocated the Tech Centre warehouse.

(22) **Trinity Infusion Services Inc. (Trinity Infusion)** obtained a DEA retail pharmacy registration on June 13, 2003, for 2804 S E Loop 820 Bldg #5, Fort Worth, Texas (SE Loop 820 warehouse). **Saran's** father owned 100% of the company and was the president. **Saran's** sister was a director.

(23) **Trinity Pharmacy Services Inc. (Trinity Pharmacy)** obtained a DEA retail pharmacy registration on March 26, 2002, for the SE Loop 820 warehouse. **Saran's** father and sister were the president and director, respectively, and **Fred Word** was the CFO. **Saran's** father and sister and **Saran** each owned 33.3% of Trinity Pharmacy. The DEA registration expired on November 30, 2004.

The Group Purchasing Organizations:

7. A "group purchasing organization" (GPO), was an entity authorized to act as a purchasing agent for a member group of entities that contracted with pharmaceutical manufacturers and wholesalers for the benefit of the member group.

8. HealthCare Purchasing Partners, Intl, L.L.P. was a GPO located in Las Colinas, Texas.
9. Innovatix, Inc. was a GPO located in New York, New York.
10. Managed Health Care Associates, Inc. was a GPO located in Florham Park, New Jersey.
11. MedAssets HSCA, Inc. was a GPO located in Missouri.
12. Pharmaceutical Buyers, Inc. was a GPO located in Broomfield, Colorado.
13. Premier Purchasing Partners was a GPO located in San Diego, California.

The Pharmaceutical Wholesalers:

14. AmerisourceBergen was a pharmaceutical wholesaler located in Valley Forge, Pennsylvania.
15. Anda, Inc. was a pharmaceutical wholesaler located in Florida.
16. Cardinal Health was a pharmaceutical wholesaler located in Dublin, Ohio.
17. H.D. Smith was a pharmaceutical wholesaler located in Fort Worth, Texas.
18. Morris & Dickson Co., L.L.C. was a pharmaceutical wholesaler located in Shreveport, Louisiana.
19. Walsh Distribution was a pharmaceutical wholesaler located in Texarkana, Texas.

The Pharmaceutical Manufacturers:

20. GlaxoSmithKline was a pharmaceutical manufacturer located in Research

Triangle Park, North Carolina.

21. Sanofi-Aventis was a pharmaceutical manufacturer located in Bridgewater, New Jersey.

Definitions:

22. Pharmaceuticals include controlled and non-controlled substances.

23. A "closed door pharmacy" was an entity whose distribution was restricted by contract to filling prescriptions for institutions such as hospitals, nursing homes and correctional facilities.

24. "Contract pricing" was discounted pricing obtained by a GPO for the benefit of a member group. The discounts were applied pursuant to contracts executed between the GPO and the pharmaceutical manufacturers. "Contract pricing" of pharmaceuticals was subject to contractual "own use" restrictions.

The Pharmacist:

25. **Leslie Wayne Davidoff**, also known as Les Davidoff, was the only pharmacist employed by **Saran's** pharmacies. He was licensed as a pharmacist in the state of Texas.

26. The Texas Board of Pharmacy required a pharmacist to verify prescription drug orders with a prescribing physician if the pharmacist questioned the accuracy or authenticity of a prescription drug order.

27. Prescriptions for controlled substances could only be filled by a pharmacist,

acting in the usual course of his professional practice and either registered individually or employed in a registered pharmacy, a registered central fill pharmacy, or registered institutional practitioner.

The Controlled Substances:

28. **Saran's** pharmacies ordered, stored, and distributed the following controlled substances, among others.

(a) Hydrocodone is the generic name for an addictive prescription painkiller that is classified under federal narcotics laws as a Schedule II controlled substance. It is classified as a Schedule III controlled substance when dispensed in amounts of not more than 15 milligrams per dosage unit and when combined with other ingredients in recognized therapeutic amounts.

(b) Phentermine hydrochloride is classified under federal narcotics laws as a Schedule IV controlled substance.

(c) Alprazolam is classified under federal narcotics laws as a Schedule IV controlled substance.

(d) Promethazine cough syrup with codeine is classified under federal narcotics laws as a Schedule V controlled substance.

The Warehouses:

29. The Tech Centre warehouse (1700 Tech Centre Parkway #110, Arlington, Texas) was not registered with DEA as a pharmacy or as an authorized location to legally

order, store, or dispense controlled substances.

30. **Saran** used warehouses located at 2805 Arkansas, #303 and 304, Arlington, Texas (the Arkansas warehouse) and 2211 Duluth, Pantego, Texas (the Duluth warehouse). These warehouses were not registered with DEA as pharmacies or as authorized locations to legally order, store, or dispense controlled substances.

Internet Facilitation Centers:

31. An Internet Facilitation Center (IFC) is an entity that operates store front websites designed to facilitate the distribution of controlled substances to internet customers.

32. Heaven Sent Drug Service, Inc. was an IFC owned and operated by **Steven Rosner** at his residence located at 771 NE Marine Drive, Boca Raton, Florida.

33. Moheba Inc. was an IFC owned and operated by **Steven Rosner** at his residence located at 771 NE Marine Drive, Boca Raton, Florida, using the store front websites www.clickonmeds.com and www.offer-pills.com.

34. Global One, Inc. was an IFC owned and operated by **Gil Lozano** at 1450 Madruga Ave. #207, Coral Gables, Florida.

35. RX Omni Care, Inc. was an IFC owned and operated by **Gil Lozano** at 1450 Madruga Ave. #207, Coral Gables, Florida, using the store front website www.rxgreatprices.com.

36. GTM World, Inc. and GTM USA Corp were IFCs owned and operated by

Gaston Blanchet, Jr. at his residence located at 1621 Collins Avenue, #607, Miami, Florida, using the store front websites www.rxduncan.com and www.rxcentury.com.

37. Solomon Group was an IFC owned and operated by **Sherman Ted Solomon** at his residence located at 13072 Water Point Blvd., Windermere, Florida, using the store front websites www.e-discountrx.com and www.needmeds.com.

38. Nations Drug Supply was an IFC owned and operated by **Saran** at the Tech Centre warehouse, using the store front website www.nationsdrugsupply.com.

Count 1
Conspiracy to Commit Health Care, Mail and Wire Fraud,
Money Laundering and Illegal Monetary Transaction
(Violation of 18 U.S.C. § 371)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.

The Conspiracy

2. Beginning in or about November 1999, the exact date being unknown to the Grand Jury, and continuing through on or about September 20, 2005, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, **Stacy Fred Word**, also known as Fred Word, **David Kaiser**, **Leslie Wayne Davidoff**, also known as Les Davidoff, **Cherie Ann Word**, **Ayesha Siddiqui**, also known as Ayesha Siddiqi, **Margie Molina**, **George Schmidt**, **Matthew Fred Valdez**, **Levoie Wayne Branam**, **Sameer A. Sayed**, **Winston Anthony Williams**, **Arron Kyle Woodcock**, **Heather Rachelle Elliott**, **David Thane Muns**, **Gaston Blanchet, Jr.**, **Sherman Ted Solomon**, **Steven Rosner**, **Gil Lozano**, **Alliance Pharmacy Services, Inc.**, **AMS Pharmaceuticals Group, Inc.**, **Carrington Health Care System, Inc.**, **Dalamar Services, Inc.**, **East Pointe Pharmacy Services, Inc.**, **Everest Services, Inc.**, **Infiniti Services Group, Inc.**, **Med-Care Infusion Services, Inc.**, **National Executive Management, Inc.**, **Orion Pharmacy Services, Inc.**, **Precision Pharmacy Services, Inc.**, **Premium Pharmacy Services, Inc.**, **Quantum**

Infusion, Inc., Reliance Pharmaceutical, Inc., Southwest Infusion, Inc., SWS Pharmacy Services, Inc., Texas Home Infusion, L.L.C., Tri-Phasic Pharmacy, Inc., Trinity Infusion Services, Inc., and Trinity Pharmacy Services, Inc., did knowingly and intentionally combine, conspire, confederate, and agree among themselves and with each other, and with others known and unknown to the Grand Jury, to defraud the United States by impeding its ability to regulate the distribution of controlled substances, and to commit certain offenses against the United States, to wit:

- (a) healthcare fraud, in violation of 18 U.S.C. § 1347;
- (b) mail fraud, in violation of 18 U.S.C. § 1341;
- (c) wire fraud, in violation of 18 U.S.C. § 1343;
- (d) money laundering, in violation of 18 U.S.C. § 1956(a)(1)(A)(I), and
- (e) illegal monetary transaction, in violation of 18 U.S.C. § 1957(a).

Manner and Means of the Conspiracy

3. It was part of the conspiracy that the defendants and others, known and unknown to the Grand Jury, would and did:

- (a) make false representations to GPOs to obtain “contract pricing” for the purchase of pharmaceuticals from commercial wholesalers and manufacturers;
- (b) falsely represent to own and operate “own use” and “closed door” pharmacies;
- (c) fraudulently obtain pharmaceuticals in violation of “own use” or

“closed door” pharmacy contract restrictions;

(d) use numerous closely held entities to disguise the identity of the purchaser of pharmaceuticals from wholesalers and manufacturers;

(e) conceal the fraudulent restricted purchases and sales by altering records and documents;

(f) fraudulently and illegally distribute controlled substances through the Internet;

(g) fraudulently obtain and distribute in excess of \$200 million worth of pharmaceuticals; and

(h) divert the fraudulently obtained proceeds from the sale and distribution of pharmaceuticals for personal use and benefit.

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy and to achieve the objects thereof, defendants, and others known and unknown to the Grand Jury, committed and caused to be committed the following acts, among others, in the Dallas Division of the Northern District of Texas, and elsewhere:

1. On or about November 22, 1999, **Saran** falsely represented to Pharmaceutical Buyers, Inc., a GPO, that he was the president of Get Well Pharmacy & Medical Services, located in Fort Lauderdale, Florida.

2. On or about August 11, 2000, in order to obtain preferred “contract pricing

from pharmaceutical suppliers, **Saran** falsely represented to Managed Health Care Associates, Inc., a GPO, that **AMS** was an “own use” institutional pharmacy that distributed pharmaceuticals to nursing homes with 7,928 beds.

3. On or about September 27, 2001, **Saran** and **Texas Home** fraudulently ordered, purchased and delivered, pharmaceuticals from AmerisourceBergen, invoice number 7029003, at a discount of \$13,451.86.

4. On or about October 3, 2001, **Fred Word** falsely represented to Innovatix, Inc., a GPO, that **SWS** was a “closed door,” “own use” pharmacy that distributed pharmaceuticals to long term care facilities with 236,214 beds.

5. On or about October 3, 2001, **Fred Word** falsely certified to Innovatix, Inc. that it was **SWS**’s exclusive group purchasing organization for contract pricing.

6. On or about October 3, 2001, **Schmidt** and **Texas Home**, falsely represented to Innovatix Inc., a GPO, that **Texas Home** was a “closed door” pharmacy with “own use” institutional distribution.

7. On or about November 12, 2001, **Saran** falsely represented and certified to Managed Health Care Associates, Inc., a GPO, that **AMS** was an “own use” pharmacy and agreed to all the conditions associated with the purchase pharmaceuticals through the Managed Health Care Associates contract.

8. On or about November 12, 2001, **Saran** falsely represented to Managed Health Care Associates, Inc., that **AMS** was a “closed door” pharmacy providing services

to long-term care facilities and did not sell or distribute pharmaceuticals outside **AMS**.

9. On or about May 21, 2002, **Kaiser** falsely represented to Managed Health Care Associates, Inc., a GPO, that **Alliance** was a “closed door,” “own use” pharmacy that distributed pharmaceuticals to long-term care nursing homes, and assisted living and correctional facilities.

10. On or about June 21, 2002, **Schmidt** falsely represented **AMS** as a “closed door,” “own use” institutional pharmacy that distributed pharmaceuticals to correctional facilities with 81,000 inmates.

11. On or about August 19, 2002, **Saran** and **AMS** fraudulently ordered, purchased, and delivered pharmaceuticals from Walsh Distribution, L.L.C., invoice number 379501, at a discount of \$159,029.72.

12. On or about December 20, 2002, **Fred Word** falsely notified Innovatix, Inc., a GPO, that **SWS** had requested removal from all other GPO contracts in order to enter into an exclusive contract with Innovatix.

13. On or about December 20, 2002, **Ayesha Siddiqui** falsely represented to Innovatix, Inc., that she was **East Pointe**’s president and that **East Pointe** was a “closed door,” “own use” correctional facilities pharmacy.

14. On or about September 27, 2001, **Saran** and **Texas Home** fraudulently ordered, purchased, and delivered, pharmaceuticals from AmerisourceBergen, invoice number 7029003, at a discount of \$13,451.86.

15. On or about February 24, 2003, **Saran** and **Southwest** fraudulently ordered, purchased, and delivered, pharmaceuticals from Cardinal Health, invoice number 2342275, at a discount of \$25,369.92.

16. On or about March 26, 2003, **Cherie Word** falsely certified and signed an Innovatix Inc. GPO member enrollment form and participation agreement for **Quantum**, falsely representing that **Quantum** was a "closed door" pharmacy with "own use" distribution.

17. On or about March 26, 2003, **Cherie Word** submitted a false certification to GlaxoSmithKline stating that **Quantum** was a "closed door," home health pharmacy with "own use" distribution.

18. On or about April 8, 2003, **Molina** submitted a false "own use" certification to GlaxoSmithKline, falsely certifying that **Alliance** was a member of MedAssets, a GPO. **Molina** also represented that **Alliance** was an "own use," "closed door," long-term care institutional pharmacy.

19. On or about December 18, 2003, **Saran** falsely represented to the Texas Department of State Health Services that he was a commercial wholesaler of pharmaceuticals.

20. On or about March 16, 2004, **Saran** falsely represented to GlaxoSmithKline, that **Southwest** distributed in excess of one million dollars worth of "own use" pharmaceuticals to Kindred.

21. On or about May 7, 2004, **Molina** falsely represented and certified to GlaxoSmithKline, that **National, AMS, East Pointe, Precision, Premium, Reliance, Southwest, SWS, Texas Home, Alliance, Trinity Pharmacy, Med-Care and Quantum** were members of MedAssets HSCA, Inc., a GPO that distributed pharmaceuticals to skilled nursing facilities and correctional facilities with beds totaling 44,333.

22. On or about February, 28, 2005, **Valdez** purchased Southwest Securities Bank cashier's check number 18731, in the amount of \$26,789.81, to pay for contract work on **Saran's** home at 2320 Panorama Ct., Arlington, Texas.

23. On or about March 21, 2005, **Valdez** purchased Southwest Securities Bank cashier's check number 18992, in the amount of \$22,096.06, to purchase an automobile for **Cherie Word**.

24. On or about May 3, 2005, **Valdez** purchased Southwest Securities Bank cashiers check number 19590, in the amount of \$41,077.97, to pay for contract work on **Saran's** home at 2320 Panorama Ct., Arlington, Texas.

25. On or about May 6, 2005, **Saran** falsely represented to a DEA investigator that he was **Imraan Siddiqi**, secretary of **East Pointe**.

26. On or about May 6, 2005, **Ayesha Siddiqui**, falsely told DEA investigators that **East Pointe** did not handle or distribute controlled substances.

27. On or about May 9, 2005, **Saran** and **Tri-Phasic** fraudulently ordered, purchased and delivered pharmaceuticals from Morris & Dickson, located in Shreveport,

Louisiana, invoice number 5202139, at a discount of \$1,250.35.

28. On or about June 8, 2005, **Schmidt** falsely represented himself that he was the purchasing director for Kindred Healthcare, and had been doing business with **Saran**.

29. On or about June 9, 2005, **Davidoff** falsely represented, in a Pharmacist License Renewal form submitted to the Texas State Board of Pharmacy, that he was employed as a pharmacist for only three pharmacies.

30. On or about March 22, 2005, **Saran** paid for a 2002 Acura RL automobile, bearing Vehicle identification Number (VIN) JH4KA96592C007073, which had been leased by **Cherie Word**, with a Southwest Securities Bank cashier's check number 18992, in the amount of \$22,096.06.

31. On or about June 10, 2003, **Saran** caused A&K Medical Supply, Co. to wire transfer \$339,885.70 to **Carrington's** Compass Bank account number XXXXXX5933, as payment for A&K Medical Supply's wholesale commercial purchase of pharmaceuticals fraudulently sold by **Saran**.

32. On or about February 26, 2003, **Saran** caused APO Health to wire transfer \$73,823.97 to **Carrington's** Compass Bank account number XXXXXX5933, as payment for APO Health's wholesale commercial purchase of pharmaceuticals fraudulently sold by **Saran**.

33. Between on or about March 25, 2004, and continuing to on or about April 29, 2005, **Saran, Davidoff, Kaiser, Fred Word** and others known and unknown to the

Grand Jury, wire transferred, and caused to be wire transferred, \$19,537,100.41, to Morris & Dickson Co., as payment for controlled substances.

34. Between on or about August 19, 2004, and continuing to on or about December 17, 2005, **Saran, Davidoff, Kaiser, Fred Word**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$172,476.42, to Harvard Drug Group, as payment for controlled substances.

35. Between on or about September 9, 2004, and continuing until on or about May 11, 2005, **Saran, Davidoff, Kaiser, Fred Word**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$2,579,983.12, to Anda, Inc., as payment for controlled substances.

36. Between on or about February 3, 2005, and continuing to on or about June 2, 2005, **Saran, Lozano**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$190,108.52, to **Saran's** bank accounts in the Northern District of Texas, as payment for controlled substances.

37. Between on or about February 3, 2005, and continuing to on or about July 21, 2005, **Saran, Solomon**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$552,458.74, to **Saran's** bank accounts in the Northern District of Texas, as payment for controlled substances.

38. Between on or about April 13, 2005, and continuing to on or about July 20, 2005, **Saran and Steven Rosner**, and others known and unknown to the Grand Jury, wire

transferred, and caused to be wire transferred, \$1,145,816.33, to **Saran**'s bank accounts, as payment for controlled substances.

All in violation of 18 U.S.C. § 371 (18 U.S.C. §§ 1347, 1341, 1343, 1956(a)(1)(A)(I) and 1957(a)).

Counts 2 through 5
Health Care Fraud
(Violations of 18 U.S.C. §§ 1347 and 2)

1. The Grand Jury realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.

2. Beginning in or about November 1999, the exact date being unknown to the Grand Jury, and continuing through on or about September 20, 2005, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, aided and abetted by others known and unknown to the Grand Jury, did knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud health care benefit programs and obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the control of, such health care benefit programs in connection with the delivery of and payment for health care benefits, items and services.

3. The object of the scheme and artifice to defraud was for defendant **Saran** to unlawfully enrich himself, and others known and unknown to the Grand Jury, by:

(a) making false representations to health care benefit programs, namely group purchasing organizations which affected interstate commerce, to obtain "contract pricing" for the purchase of pharmaceuticals from commercial wholesalers and manufacturers;

- (b) falsely representing to operate an “own use” and “closed door” pharmacy;
- (c) obtaining, by fraud, pharmaceuticals in violation of “own use” or “closed door pharmacy” group purchasing organizations contract restrictions;
- (d) using numerous, closely held entities to purchase pharmaceuticals, in order to disguise the true identity of the purchaser from wholesalers and manufacturers;
- (e) altering records and documents to conceal the fact that pharmaceuticals had been attained by fraud and had been sold illegally;
- (f) fraudulently and illegally distributing controlled substances to Internet customers;
- (g) fraudulently obtaining and distributing in excess of \$200,000,000.00 of pharmaceuticals; and
- (h) diverting the profits for personal use and benefit.

4. In furtherance of the scheme and artifice to defraud, beginning on or about December 7, 2000, and continuing through on or about October 1, 2004, **Saran** fraudulently purchased in excess of \$25,000,000.00 of pharmaceuticals from AmerisourceBergen, a commercial wholesale pharmaceutical distributor, and subsequently diverted the pharmaceuticals, in violation of the group purchasing organization contract “own use” distribution restriction.

5. In furtherance of the scheme and artifice to defraud, beginning on or about

March 29, 2001, and continuing through on or about January 22, 2004, **Saran** fraudulently purchased in excess of \$88,000,000.00 of pharmaceuticals from Walsh Distribution, L.L.C., a commercial wholesale pharmaceutical distributor, and subsequently diverted the pharmaceuticals, in violation of the group purchasing organization contract "own use" distribution restriction.

6. In furtherance of the scheme and artifice to defraud, beginning on or about June 4, 2002, and continuing through on or about August 31, 2005, **Saran** fraudulently purchased in excess of \$50,000,000.00 of pharmaceuticals from Cardinal Health, Dublin, Ohio, a commercial wholesale pharmaceutical distributor, and subsequently diverted the pharmaceuticals, in violation of the group purchasing organization contract "own use" distribution restriction.

7. In furtherance of the scheme and artifice to defraud, beginning on or about October 6, 2000, and continuing through on or about May 10, 2005, **Saran** fraudulently purchased in excess of \$45,000,000.00 pharmaceuticals from Morris & Dickson Co. L.L.C., a commercial wholesale pharmaceutical distributor, and subsequently diverted the pharmaceuticals, in violation of the group purchasing organization contract "own use" distribution restriction.

8. On or about each of the dates set forth below, in each of the Counts set forth below, **Saran**, did knowingly and willfully execute, and attempt to execute, the aforesaid scheme and artifice to defraud health care benefit programs by causing each

fraudulent purchase of pharmaceuticals through a closely held entity as set forth below, said purchases perpetrated on the group purchasing organizations and pharmaceutical distributors identified below, each purchase resulting in a fraudulently obtained discount:

Count	Date	Group Purchasing Organization/ Pharmaceutical Distributor	Purchase by Saran Entity
2	09/27/01	HealthCare Purchasing Partners, Intl.,LLP/ AmerisourceBergen	\$43,096.02 purchase of pharmaceuticals by Texas Home
3	08/19/02	Innovatix, LLC and Managed Health Care Associates, Inc./ Walsh Distribution, L.L.C.	\$649,670.91 purchase of pharmaceuticals by AMS
4	02/24/03	Innovatix, LLC / Cardinal Health	\$67,347.36 purchase of pharmaceuticals by Southwest
5	05/09/05	Premier Purchasing Partners/ Morris & Dickson	\$8,926.51 purchase of pharmaceuticals by Tri-Phasic,

Each in violation of 18 U.S.C. §§ 1347 and 2.

Counts 6 through 23
Mail Fraud
(Violation of 18 U.S.C. §§ 1341 and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction and Counts 1 and 2 through 5 of this indictment.

2. On or about each of the dates set forth below, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, aided and abetted by others, known and unknown to the Grand Jury, for the purpose of executing and carrying out the aforesaid conspiracy and scheme and artifice to defraud and attempting to do so, did knowingly, and with the intent to defraud, cause to be sent, delivered, by the United States Postal Service, a matter and thing, namely, correspondence, each such use of the mail constituting a separate count of this indictment:

Count	Date	Addressor/Sender	Addressee/Receiver
6	12/05/00	Bergen Brunswig Drug, Co. John T. Rasor General Finance Manager Dallas, Texas	Carrington Healthcare Systems, Inc. 301 East Stephens St. Arlington, Texas 76018 Att: Mr. Nisha Johar Saran
7	01/30/01	Amerisource Steve Rammelsberg VP of Alternate Site Sales SouthWest Region Grand Prairie, Texas	Mr. Al Bruno Creative Pharmaceutical Resources Deerfield Beach, Florida 33442
8	02/16/01	Carrington Healthcare Systems, Inc. Joe Saran	Mr. Brandon Frazier Healthcare Purchasing Partners International, Ltd. Las Colinas, Texas 75062

Count	Date	Addressor/Sender	Addressee/Receiver
9	06/06/01	Joseph J. Montoto, Rph Vice President Branded Rx Supply Management AmeriSource Chesterbrook, Pennsylvania	Mr. Gilbert White National Account Director Pharmacia Wescosville, Pennsylvania 18106
10	09/28/01	Steve Rammelsberg VP Alternate Site Sales AmerisourceBergen Grand Prairie, Texas	Joe Saran, President Carrington Healthcare Systems Arlington, Texas 76016
11	10/30/01	Fred Word SWS Pharmacy Services, Inc. 1126 South Cedar Ridge Suite 123 Duncanville, Texas 75137	Managed Health Care Associates, Inc. Florham Park, New Jersey 07932
12	11/07/01	George Schmidt President Texas Home Infusion, LLC, Arlington, Texas	Managed Health Care Associates, Inc. Florham Park, New Jersey 07932
13	11/12/01	Joe Saran President AMS Pharmaceutical Group, Arlington, Texas	Managed Health Care Associates, Inc. Florham Park, New Jersey 07932
14	06/18/02	Craig Denton Director of Key Accounts Walsh Healthcare Solutions San Antonio, Texas	Joe Saran, Pres. Arlington, Texas 76018
15	12/20/02	Fred Word, Owner SWS Pharmacy Services, Inc., 1126 South Cedar Ridge, Suite 123 Duncanville, Texas 75137	Inovatix, Inc. New York, NY 10011
16	12/20/02	George Schmidt, Owner Texas Home Infusion, LLC 4300 Beltway Place, Suite 125 Arlington, Texas 76018	Inovatix, Inc. New York, NY 10011
17	12/20/02	Ayesha Siddiqi, President East Pointe Pharmacy Services, Inc. 2100 Highway 360, Suite 1001 Grand Prairie, Texas 75050	Inovatix, Inc. New York, NY 10011

Count	Date	Addressor/Sender	Addressee/Receiver
18	12/20/02	Joe Saran, Owner AMS Pharmaceutical Group, Inc. 301 East Stephens Street Suite 100 Arlington, Texas 76018	Innovatix, Inc. New York, NY 10011
19	02/19/03	Sandra Cashe Senior VP Marketing and Development Walsh Healthcare Solutions San Antonio, Texas	Joe Saran, President, Carrington HealthCare Systems Arlington, TX 76018
20	06/26/03	Tim Boes Cardinal Healthcare Roanoke, Texas	Carrington Healthcare Systems, Inc Attn John Saran, President Arlington. TX 76018
21	03/30/04	Joe Saran, Southwest Infusion, Inc. 301 E. Stephens Street Suite 100-A Arlington, Texas 76018	Mr. Clayton K. Whitehead, GlaxoSmithKline Research Triangle Park, North Carolina
22	05/31/05	Walsh A D&K Healthcare Resources Company Craig Denton, VP/General Manager, Texarkana, Texas 75503	Joe Saran President Infiniti Services Group, Inc. 1700 Tech Centre Parkway Suite 110 Arlington, TX 76014
23	06/09/05	Leslie Wayne Davidoff P.O. Box 1820221 Arlington, Texas 76096	Texas State Board of Pharmacy 333 Austin, Texas 78701

Each in violation of 18 U.S.C. §§ 1341 and 2.

Counts 24 through 66
Wire Fraud
(Violation of 18 U.S.C. §§1343 and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction and Counts 1 and 2-5 of this indictment.
2. On or about each of the dates set forth below, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, aided and abetted by others known and unknown to the Grand Jury, for the purpose of executing and carrying out the aforesaid conspiracy and scheme and artifice to defraud, and attempting to do so, did knowingly, and with the intent to defraud, cause to be transmitted in interstate commerce, by means of wire and radio communication, certain writing, signs, signals, and sounds constituting a wire transfer of money and funds, from **Saran's** bank account in the amounts indicated, to a pharmaceutical wholesaler's bank, as payment for **Saran's** purchases of pharmaceuticals for distribution, each such transmittal constituting a separate count of this indictment:

Count	Date of Transmission	Payor: Saran's Bank and Account Number	Payee: Pharmaceutical Wholesaler	Wired Amount
24	02/27/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$942,870.99
25	03/04/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$316,648.21
26	03/10/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$553,159.29

Count	Date of Transmission	Payor: Saran's Bank and Account Number	Payee: Pharmaceutical Wholesaler	Wired Amount
27	03/11/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$458,030.35
28	03/14/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$404,789.09
29	03/17/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$302,402.31
30	03/18/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$1,022,142.33
31	03/19/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$324,277.36
32	03/20/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$1,000,000.00
33	03/24/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$350,000.00
34	03/25/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$350,000.00
35	03/31/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$750,000.00
36	04/07/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$592,947.02
37	04/08/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$500,000.00
38	04/15/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$450,000.00
39	04/25/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$362,551.31
40	05/14/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$575,000.00
41	05/16/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$492,252.67
42	05/29/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$311,082.88

Count	Date of Transmission	Payor: Saran's Bank and Account Number	Payee: Pharmaceutical Wholesaler	Wired Amount
43	05/30/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$325,256.19
44	06/05/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$500,000.00
45	06/13/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$525,000.00
46	06/20/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$305,000.00
47	06/23/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$389,896.64
48	07/02/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$408,000.00
49	08/27/03	Compass Bank xxxxxx5933	Cardinal Health Dublin, Ohio	\$325,000.00
50	09/15/03	Compass Bank xxxxxx6247	D&K Healthcare Resources, Inc. St. Louis, Missouri	\$33,219.71
51	10/12/03	Compass Bank xxxxxx5852	D&K Healthcare Resources, Inc. St. Louis, Missouri	\$54,850.40
52	10/15/03	J.P. Morgan Chase Bank xxx-xxxxx67-65	McKesson, Corp. San Francisco, California	\$154,940.96
53	11/18/03	J.P. Morgan Chase Bank xxx-xxxxx67-65	McKesson, Corp. San Francisco, California	\$152,443.18
54	12/18/03	J.P. Morgan Chase Bank xxx-xxxxx67-65	McKesson, Corp. San Francisco, California	\$151,570.84
55	06/12/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug Corp. Valley Forge, Pennsylvania	\$223,133.82

Count	Date of Transmission	Payer, Payee's Bank and Account Number	Payee: Pharmaceutical Wholesaler	Wired Amount
56	06/21/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$204,461.25
57	08/17/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$228,170.66
58	08/27/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$242,724.80
59	09/10/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$211,711.89
60	09/25/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$701,717.05
61	09/26/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$319,948.51
62	09/27/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$228,576.29

Count	Date of Transmission	Payor: Saran's Bank and Account Number	Payee: Pharmaceutical Wholesaler	Wired Amount
63	09/28/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$218,584.48
64	10/01/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Amerisource Bergen Drug, Corp. Valley Forge, Pennsylvania	\$217,913.54
65	09/26/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Morris & Dickson, Co. Shreveport, Louisiana	\$48,878.57
66	10/03/01	J.P. Morgan Chase Bank xxx-xxxxx32-65	Morris & Dickson, Co. Shreveport, Louisiana	\$40,839.83

Each in violation of 18 U.S.C. §§1343 and 2.

Counts 67 through 91
Wire Fraud
(Violation of 18 U.S.C. §§ 1343 and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction and Counts 1 and 2-5 of this indictment.
2. On or about each of the dates set forth below, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, aided and abetted by others known and unknown to the Grand Jury, for the purpose of executing and carrying out the aforesaid conspiracy and scheme and artifice to defraud, and attempting to do so, did knowingly, and with the intent to defraud, cause to be transmitted in interstate commerce, by means of wire and radio communication, certain writing, signs, signals, and sounds constituting a wire transfer of money and funds, from pharmaceutical wholesalers' banks to **Saran's** banks, for deposit into **Saran's** accounts in the amounts indicated, as payment for wholesale pharmaceuticals purchased by the wholesaler from **Saran**, each such transmittal constituting a separate count of this indictment:

Count	Date of Transmission	Payor: Pharmaceutical Wholesaler	Payee: Saran's Bank and Account Number	Amount
67	06/10/03	A&K Medical Supply Co. Memphis, Tennessee	CompassBank xxxxxx5933	\$339,885.70
68	02/26/03	APO Health Oceanside, New York	CompassBank xxxxxx5933	\$73,823.97
69	05/28/03	Lancomed, LLC Lancaster, Pennsylvania	CompassBank xxxxxx5852	\$151,866.26

Count	Date of Transmission	Payor: Pharmaceutical Wholesaler	Payee: Saran's Bank and Account Number	Amount
70	05/13/03	Sucal Medical, Inc. Bergenfield, New Jersey	CompassBank xxxxxx5852	\$142,584.83
71	08/04/03	Sucal Medical, Inc. Bergenfield, New Jersey	CompassBank xxxxxx5852	\$160,618.26
72	08/19/03	Sucal Medical, Inc. Bergenfield, New Jersey	CompassBank xxxxxx5852	\$154,169.24
73	03/10/03	A&K Medical Supply, Co. Memphis, Tennessee	Compass Bank xxxxxx5518	\$300,682.15
74	04/04/03	A&K Medical Supply, Co. Memphis, Tennessee	Compass Bank xxxxxx5518	\$417,109.05
75	02/25/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$304,796.64
76	02/28/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$500,000.00
77	03/07/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$478,690.56
78	03/12/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$415,146.87
79	03/14/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$550,000.00
80	03/19/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$1,000,000.00
81	04/04/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$400,000.00
82	05/09/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$400,000.00
83	05/15/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$400,000.00
84	05/29/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$500,000.00
85	06/04/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$600,000.00

Count	Date of Transmission	Payor: Pharmaceutical Wholesaler	Payee: Saran's Bank and Account Number	Amount
86	06/23/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$303,936.80
87	07/28/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$503,274.68
88	08/06/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$400,000.00
89	08/14/03	CMH Care Group, Inc. Chester, New Jersey	Compass Bank xxxxxx5534	\$301,127.37
90	04/22/03	MB of New Jersey, Inc. Flanders, New Jersey	Compass Bank xxxxxx5534	\$200,000.00
91	05/29/03	MB of New Jersey, Inc. Flanders, New Jersey	Compass Bank xxxxxx5534	\$177,011.60

Each in violation of 18 U.S.C. §§ 1343 and 2.

Count 92
Conspiracy to Distribute Controlled Substances
(Violation of 21 U.S.C. § 846)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.

The Conspiracy

2. From in or about the Spring 2004, the exact date unknown to the Grand Jury, and continuing to on or about September 20, 2005, in the Dallas Division of the Northern District of Texas, and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as Rakesh Johar Saran, Johar Saran, Joe Saran and Imraan Siddiqi, **David Kaiser**, **Leslie Wayne Davidoff** also known as Les Davidoff, **Matthew Fred Valdez**, **Levoie Wayne Branam**, **Sameer A. Sayed**, **Winston Anthony Williams**, **Arron Kyle Woodcock**, **Heather Rachelle Elliott**, **David Thane Muns**, **Gaston Blanchet, Jr.**, **Sherman Ted Solomon**, **Gil Lozano**, **Steven Rosner**, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to commit the following offenses against the United States, namely, to distribute and possess with the intent to distribute, outside the scope of professional practice and not for a legitimate medical purpose, a controlled substance, that is:

(a) at least 24 million dosage units of hydrocodone, a Schedule III controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(D);

(b) at least 6 million dosage units of phentermine, a Schedule IV controlled substance in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(2);

(c) at least 6 million dosage units of alprazolam, a Schedule IV controlled substance in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(2); and

(d) at least 7 million dosage units of promethazine cough syrup with codeine, a Schedule V controlled substance in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(3).

Manner and Means of the Conspiracy

3. It was part of the conspiracy that the defendants and others known and unknown to the Grand Jury, would and did:

(a) receive deliveries of controlled substances, to include hydrocodone, phentermine, alprazolam, and promethazine cough syrup with codeine, from pharmaceutical distributors or manufacturers;

(b) use personal vehicles to pick up boxes containing pint bottles of promethazine cough syrup with codeine from H.D. Smith;

(c) transfer the controlled substances from the DEA registered pharmacies to either the Stephens warehouse, or unregistered locations such as the Tech Centre warehouse and the Duluth warehouse;

(d) soak the pint bottles of promethazine cough syrup with codeine in water to soften the labels;

(e) scrape the lot number and other identifiers from the labels affixed to the

pint bottles of promethazine cough syrup with codeine;

(f) receive orders from Internet customers for controlled substances, through emails from the IFCs, or by downloading the orders from IFC websites;

(g) distribute controlled substances to Internet customers without verifying their identity, their personal information, or their medical claims;

(h) distribute controlled substances to Internet customers without verifying a legitimate medical purpose;

(i) distribute controlled substances to Internet customers without verifying a valid doctor/patient relationship;

(j) distribute controlled substances to Internet customers who used alias or fictitious names, or provided false or insufficient identification;

(k) distribute controlled substances to Internet customers without legitimate prescriptions;

(l) distribute controlled substances to Internet customers in violation of state and federal requirements to: maintain records, to secure pharmacies and controlled substances, and to dispense controlled substances only from DEA registered locations;

(m) use personal vehicles to distribute pint bottles of promethazine cough syrup with codeine;

(n) arrange for the delivery of the controlled substances through package delivery services;

(o) receive cash from customers for the distribution of the pint bottles of promethazine cough syrup with codeine;

(p) notify IFCs when the Internet orders for controlled substances were filled and shipped; and

(q) receive wire or electronic transfers of funds from IFCs for the Internet orders of controlled substances.

Overt Acts In Furtherance of the Conspiracy

In furtherance of the conspiracy and its objects, the conspirators and others, known and unknown to the Grand Jury, committed the following overt acts, among others in the Dallas Division of the Northern District of Texas, and elsewhere.

1. Between on or about March 25, 2004, and continuing to on or about April 29, 2005, **Saran, Davidoff, Kaiser, Fred Word**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$19,537,100.41, to Morris & Dickson Co., as payment for controlled substances.

2. Between on or about August 19, 2004, and continuing to on or about December 17, 2005, **Saran, Davidoff, Kaiser, Fred Word**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$172,476.42, to Harvard Drug Group, as payment for controlled substances.

3. Between on or about September 9, 2004, and continuing until on or about May 11, 2005, **Saran, Davidoff, Kaiser, Fred Word**, and others known and unknown to

the Grand Jury, wire transferred, and caused to be wire transferred, \$2,579,983.12, to Anda, Inc., as payment for controlled substances.

4. On or about September 16, 2004, **Saran, Davidoff, Tri-Phasic**, and others known and unknown to the Grand Jury, distributed 90 tablets of 37.5mg phentermine, to an undercover investigator posing as Brian Kaye, without verifying a legitimate medical purpose, a prescription, or the identity of the drug buyer.

5. Between on or about October 15, 2004, and continuing to on or about March 17, 2005, **Saran, Davidoff, Kaiser, Fred Word**, and others known and unknown to the Grand Jury, wire transferred and caused to be wire transferred, \$1,013,315.61, to H.D. Smith, as payment for controlled substances.

6. On or about November 3, 2004, a person known to the Grand Jury received a delivery of boxes containing controlled substances at Collective from Morris & Dickson, and then transported the boxes to the Stephens warehouse in a private vehicle.

7. On or about November 5, 2004, **Heather Rachelle Elliott, Matthew Fred Valdez**, and a person known to the Grand Jury, unloaded boxes containing controlled substances from their personal vehicles into the Stephens warehouse.

8. On or about November 10, 2004, a person known to the Grand Jury received a delivery of boxes containing controlled substances from Morris & Dickson at the SE Loop 820 warehouse, then transported the boxes to the Stephens warehouse in a private vehicle.

9. On or about November 10, 2004, **Elliott** received a delivery of boxes containing controlled substances at Paradigm from Morris & Dickson, and then transported the boxes to the Stephens warehouse in her private vehicle.

10. On or about November 10, 2004, a person known to the Grand Jury received a delivery of boxes containing controlled substances from Morris & Dickson at the Collective, then transported the boxes to the Stephens warehouse in a private vehicle.

11. On or about November 17, 2004, **Elliott** transported boxes containing controlled substances from Paradigm to the Stephens warehouse.

12. On or about December 2004, **David Thane Muns** and **Levoie Wayne Branam** unloaded approximately 20 Morris and Dickson boxes from a personal vehicle into the Stephens warehouse.

13. On or about January 28, 2005, **Branam** and **Valdez** unloaded boxes containing promethazine cough syrup with codeine from a personal vehicle into the Duluth warehouse.

14. On or about January 28, 2005, **Branam** loaded boxes containing controlled substances including promethazine cough syrup with codeine from the Duluth warehouse into his personal vehicle. **Branam** drove to the Stephens warehouse, met **Saran**, then **Branam** drove to 2801 Virgil, Dallas, Texas, and delivered the boxes to a person unknown to the Grand Jury.

15. On or about February 3, 2005, **Muns** met with **Winston Anthony Williams** outside the Stephens warehouse. From the warehouse, **Williams** loaded a box into his

personal vehicle, and departed.

16. Between on or about February 3, 2005, and continuing to on or about June 2, 2005, **Saran, Lozano**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$190,108.52, to **Saran's** bank accounts in the Northern District of Texas, as payment for controlled substances.

17. Between on or about February 3, 2005, and continuing to on or about July 21, 2005, **Saran, Solomon**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$552,458.74, to **Saran's** bank accounts in the Northern District of Texas, as payment for controlled substances.

18. On or about February 8, 2005, **Valdez** and **Branam** used personal vehicles to pick up boxes containing approximately 1032 pint bottles of promethazine cough syrup with codeine from H.D. Smith. **Valdez** unloaded the boxes into the Tech Centre warehouse, and then drove to the Duluth warehouse and assisted **Branam** with unloading his vehicle.

19. On or about February 8, 2005, **Saran**, and others known and unknown to the Grand Jury, possessed 1,869 pint bottles of promethazine cough syrup with codeine at the Duluth warehouse.

20. On or about February 11, 2005, **Valdez** used his personal vehicle to transport approximately 1016 pint bottles of promethazine cough syrup with codeine from H.D. Smith to the Duluth warehouse.

21. On or about February 16, 2005, **Branam** used his personal vehicle and picked up boxes containing approximately 1,680 pint bottles of promethazine cough syrup with codeine from H.D. Smith. **Branam, Valdez, and Sameer A. Sayed** unloaded **Branam's** vehicle into the SE Loop 820 warehouse.

22. On or about February 16, 2005, **Sayed** transported boxes containing promethazine cough syrup with codeine from the SE Loop 820 warehouse to a restaurant parking lot where he met with **Saran**. **Sayed** then transported the boxes to an apartment complex in Plano, Texas.

23. On or about February 24, 2005, **Sayed** used his personal vehicle to transport boxes containing approximately 120 wet pint bottles of promethazine cough syrup with codeine, with the lot numbers and identifiers scraped off the labels, from the SE Loop 820 warehouse to a restaurant parking lot where he met with **Saran**.

24. On or about February 25, 2005, **Valdez** used his personal vehicle to transport boxes containing 16 cases of promethazine cough syrup with codeine from H.D. Smith to SE Loop 820 warehouse.

25. On or about March 1, 2005, **Valdez** used his personal vehicle to transport boxes containing approximately 192 pint bottles of promethazine cough syrup with codeine from H.D. Smith to the SE Loop 820 warehouse.

26. On or before March 9, 2005, **Saran**, and others known and unknown to the Grand Jury, distributed approximately 1504 pint bottles of promethazine cough syrup

with codeine.

27. On or about April 5, 2005, **Valdez** possessed 180 pint bottles of promethazine cough syrup with codeine to the Duncanville warehouse. **Valdez** then transported the 180 pint bottles of promethazine cough syrup with codeine to the Tech Centre warehouse.

28. On or about April 6, 2005, **Branam** placed a box outside the Tech Centre warehouse.

29. On or about April 6, 2005, **Muns** loaded a brown box from the Tech Centre warehouse into **William's** vehicle. **Muns** also loaded a box left by **Branam**.

30. On or about April 6, 2005, **Williams** used his personal vehicle to transport controlled substances, including 48 pint bottles of promethazine cough syrup with codeine and approximately 7500 hydrocodone tablets, from the Tech Centre warehouse to another location in Arlington, Texas.

31. Between on or about April 13, 2005, and continuing to on or about July 20, 2005, **Saran** and **Steven Rosner**, and others known and unknown to the Grand Jury, wire transferred, and caused to be wire transferred, \$1,145,816.33, to **Saran's** bank accounts, as payment for controlled substances.

32. On or about April 21, 2005, **Blanchet**, through www.rxduncan.com, accepted an Internet order for 90 tablets of 10/325mg hydrocodone from an undercover investigator posing as Internet customer "William Taft."

33. On or about April 21, 2005, **Blanchet**, using www.rxduncan.com, directed

Internet customer "William Taft" to provide a blank money order for \$269.00 to the package delivery service upon delivery of the hydrocodone.

34. On or about April 21, 2005, **Saran, Blanchet, Davidoff**, and others known and unknown to the Grand Jury, distributed 90 tablets of 10/325mg hydrocodone to Internet customer "William Taft," without verifying a legitimate medical purpose, a prescription, or the identity of the Internet customer.

35. On or about April 25, 2005, **Blanchet**, using www.rxcentury.com, accepted an Internet order for 90 tablets of 10/325mg hydrocodone from an undercover investigator posing as Internet customer "Milliard Fillmore."

36. On or about April 25, 2005, **Blanchet**, using www.rxcentury.com, directed Internet customer "Milliard Fillmore" to provide a blank money order for \$269.00 to the package delivery service upon delivery of the hydrocodone.

37. On or about April 27, 2005, **Saran, Blanchet, Davidoff** and others known and unknown to the Grand Jury, distributed 90 tablets of 10/325mg hydrocodone to an undercover investigator posing as "Millard Fillmore," without verifying a legitimate medical purpose, a prescription, or the identity of the Internet customer.

38. On or about May 5, 2005, **Saran** and **Branam** possessed at least 480 pint bottles of promethazine cough syrup with codeine at the Mansfield warehouse.

39. On or about May 10, 2005, **Saran, Davidoff, Tri-Phasic**, and others known and unknown to the Grand Jury distributed 90 tablets of 2 mg alprazolam to an undercover investigator posing as "William Taft," without verifying a legitimate medical

purpose, a prescription, or the identity of the Internet customer.

40. On or about May 13, 2005, **Saran, Branam, and Sayed** possessed pint bottles of promethazine cough syrup with codeine at the Tech Centre warehouse.

41. On or about May 13, 2005, **Solomon**, through www.e-discountrx.com, accepted an Internet order for 30 tablets of Norco 10/325mg hydrocodone from an undercover investigator posing as Internet customer "Shane Gravel."

42. On or about May 16, 2005, **Elliott** sent an email to a person known to the Grand Jury containing the name and address of a physician associated with **Blanchet's** IFC, and commented that the address was an apartment in Puerto Rico.

43. On or about May 11, 2005, **Arron Kyle Woodcock** transported a small cardboard box from the loading bay at the Duncanville warehouse to an apartment in Fort Worth, Texas, and then to **Williams's** residence in Fort Worth, Texas.

44. On or about May 18, 2005, **Saran, Davidoff, Tri-Phasic, Solomon**, and others known and unknown to the Grand Jury, distributed 30 tablets of Norco 10/325mg hydrocodone to Internet customer "Shane Gravel," without verifying a legitimate medical purpose, a prescription, or the identity of the Internet customer.

45. On or about May 18, 2005, **Infiniti** accessed www.e-discountrx.com and downloaded an excel file containing 272 controlled substance orders dated May 17, 2005, which included "Shane Gravel's" Internet order for controlled substances.

46. On or about May 19, 2005, **Blanchet**, through www.rxduncan.com, accepted an order for 90 tablets of Norco 10/325mg hydrocodone from an undercover

investigator posing as Internet customer "Groovy Cleveland."

47. On or about May 19, 2005, **Blanchet**, through www.RxDuncan.com, directed Internet customer "Groovy Cleveland" to provide a blank money order for \$275.00 to the package delivery service upon delivery of the hydrocodone.

48. On or about May 20, 2005, **Infiniti** accessed www.RxDuncan.com and downloaded a pill bottle label and a package delivery service label to ship Groovy Cleveland's controlled substance order.

49. On or about May 25, 2005, **Infiniti** emailed **Solomon** and attached an excel file which listed: (I) the controlled substance orders filled on May 17, 2005, including "Shane Gravel's" order; (ii) **Infiniti's** cost to fill "Gravel's" order as \$16.30; and (iii) **Infiniti's** cost to fill all of **Solomon's** orders for that day as \$7,784.00.

50. On or about May 23, 2005, **Saran, Davidoff, Blanchet**, and others known and unknown to the Grand Jury, distributed 90 tablets of Norco 10/325mg hydrocodone to Internet customer "Groovy Cleveland" for \$275.00, without verifying a legitimate medical purpose, a prescription, or the identity of the Internet Customer.

51. On or after May 23, 2005, **Blanchet** received a money order for \$275.00 as payment for the hydrocodone distributed to "Groovy Cleveland."

52. On or about May 25, 2005, **Elliott** and **Infiniti** emailed **Gaston Blanchet, Jr.** and attached an excel file which listed: (I) the controlled substance orders filled on May 20, 2005, including "Groovy Cleveland's" order; (ii) **Infiniti's** cost to fill Cleveland's hydrocodone order as \$18.90; and (iii) **Infiniti's** cost to fill 124 RxDuncan

Internet orders for controlled substance orders on that day as \$5,331.60.

53. On or about May 25, 2005, **Saran, Davidoff, Southwest**, and others known and unknown to the Grand Jury, distributed 90 tablets of 10/325mg hydrocodone to an undercover investigator posing as "Zach Taylor," without verifying a legitimate medical purpose, a prescription, or the identity of the Internet customer.

54. On or about May 26, 2005, **Woodcock** transported two boxes from the loading bay at the Duncanville warehouse, to an apartment in Fort Worth, Texas, then to **William's** business.

55. In or about the end of May 2005, **Saran** and **Elliott**, and others known and unknown to the Grand Jury, sent and caused to be sent, an email to **Rosner**, warning him of law enforcement investigations in Kentucky, Tennessee, and Wise and Bristol, Virginia, and as a result, **Saran's** pharmacies would not deliver controlled substance orders to drug buyers in those locations.

56. In or about the end of May 2005, **Saran, Elliott**, and others known and unknown to the Grand Jury, sent and caused to be sent an email to **Rosner** and **Blanchet** requesting that **Saran's** pharmacies only be identified by initials on the pill bottle labels, such as:

Tri-Phasic = TPPI;

East Pointe = EPPS;

Orion = OPS;

Med-Care = MED

Trinity Pharmacy = TPS.

57. On or about June 3, 2005, **Saran, Davidoff, Reliance, Infiniti**, and others known and unknown to the Grand Jury, distributed 90 tablets of 10/650mg hydrocodone to undercover investigator posing as "Dwight E. Anderson," without verifying a legitimate medical purpose, a prescription, or the identity of the Internet customer.

58. On or after June 3, 2005, **Saran** received a money order for \$395.50 as payment for the hydrocodone distributed to "Dwight E. Anderson."

59. On or about June 7, 2005, **Saran, Davidoff, Premium, Infiniti**, and others known and unknown to the Grand Jury, distributed 90 tablets of 2 mg alprazolam to an undercover investigator posing as "Dwight E. Anderson," without verifying a legitimate medical purpose, a prescription, or the identity of the Internet customer.

60. On or about June 28, 2005, **Lozano**, through www.rxgreatprices.com, accepted an order for 90 tablets of 10/650mg hydrocodone, 90 tablets of 37.5mg phentermine, and 60 tablets of alprazolam from an undercover investigator posing as Internet customer "George Bartel."

61. From or about June 28, 2005 to on or about July 1, 2005, **Saran, Davidoff, Lozano, Trinity Pharmacy**, and others known and unknown to the Grand Jury, distributed 90 tablets of 10/650mg hydrocodone, 90 tablets of 37.5mg phentermine, and 60 tablets of alprazolam to Internet customer "George Bartel," without verifying a legitimate medical purpose, a prescription, or the identity of the Internet customer.

62. On or after July 1, 2005, **Lozano** received a cashier's check for \$425.44, as

payment for the hydrocodone distributed to “George Bartel.”

63. On or about July 8, 2005, **Elliott** and **Infiniti**, and others known and unknown to the Grand Jury, sent and caused to be sent an email to **Rosner** and **Blanchet**, which stated that on July 11, 2005, the pharmacies **SWS**, **OPS (Orion)**, and **MED (Med-Care)** were relocating to the Duncanville warehouse, and directing **Rosner** and **Blanchet** to rotate the use of these three pharmacies when filling orders for controlled substances.

64. On or about July 14, 2005, **Rosner**, through www.offer-pills.com, accepted an order for 90 tablets of 105mg phendimetrazine from an undercover investigator posing as Internet customer “James Bartel.”

65. On or about July 18, 2005, **Saran**, **Rosner**, **Davidoff**, **Orion**, and others known and unknown to the Grand Jury, distributed 90 tablets of 105mg phendimetrazine to Internet customer “James Bartel,” without verifying a legitimate medical purpose, a prescription, or the identity of the Internet customer.

66. On or after July 18, 2005, **Rosner** received a money order for \$201.00, as payment for the hydrocodone distributed to “James Bartel.”

In violation of 21 U.S.C. § 846.

Count 93

Distribute and Possess with Intent to Distribute
a Controlled Substance and Aiding and Abetting
(Violations of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(D) and 18 U.S.C. § 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.
2. On or about April 21, 2005, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as Rakesh Johar Saran, Johar Saran, Joe Saran and Imraan Siddiqi, using the name Century Pharmacy located at 1700 Tech Centre Parkway, Suite 110, Arlington, TX, and **Gaston Blanchet, Jr.**, doing business as www.rxcentury.com, aided and abetted by one another and by others known and unknown to the Grand Jury, did unlawfully and knowingly distribute and possess with intent to distribute, outside the scope of professional practice and not for a legitimate medical purpose, hydrocodone, a Schedule III controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(D) and 18 U.S.C. § 2.

Count 94

Distribute and Possess with Intent to Distribute
a Controlled Substance and Aiding and Abetting
(Violations of 21 U.S.C. §§ 841(a)(1) and (b)(1)(D) and 18 U.S.C. § 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.
2. On or about May 18, 2005, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as Rakesh Johar Saran, Johar Saran, Joe Saran and Imraan Siddiqi, **Tri-Phasic Pharmacy**, and **Sherman Ted Solomon**, doing business as www.e-discountrx.com, aided and abetted by one another and by others known and unknown to the Grand Jury, did unlawfully and knowingly distribute and possess with intent to distribute outside the scope of professional practice and not for a legitimate medical purpose, hydrocodone, a Schedule III controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(D) and 18 U.S.C. § 2.

Count 95

Distribute and Possess with Intent to Distribute
a Controlled Substance and Aiding and Abetting
(Violations of 21 U.S.C. §§ 841(a)(1), (b)(1)(D), (b)(2) and 18 U.S.C. § 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.
2. On or about June 28, 2005, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as Rakesh Johar Saran, Johar Saran, Joe Saran and Imraan Siddiqi, **Trinity Pharmacy Services Inc.**, and **Gil Lozano**, doing business as www.rxgreatprices.com, aided and abetted by one another and by others known and unknown to the Grand Jury, did unlawfully and knowingly distribute and possess with intent to distribute outside the scope of professional practice and not for a legitimate medical purpose, hydrocodone, a Schedule III Controlled Substance and phentermine and alprazolam, Schedule IV controlled substances.

In violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(D), (b)(2) and 18 U.S.C. § 2

Count 96

Distribute and Possess with Intent to Distribute
a Controlled Substance and Aiding and Abetting
(Violations of 21 U.S.C. §§ 841(a)(1), 841(b)(2), and 18 U.S.C. § 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.
2. On or about July 18, 2005, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as Rakesh Johar Saran, Johar Saran, Joe Saran and Imraan Siddiqi, **Orion**, and **Steven Rosner**, doing business as www.offer-pills.com, aided and abetted by one another and by others known and unknown to the Grand Jury, did unlawfully and knowingly distribute and possess with intent to distribute outside the scope of professional practice and not for a legitimate medical purpose, phendimetrazine, a Schedule IV controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1), 841(b)(2), and 18 U.S.C. § 2.

Count 97

Distribute and Possess with Intent to Distribute
a Controlled Substance and Aiding and Abetting
(Violations of 21 U.S.C. §§ 841(a)(1) and (b)(3) and 18 U.S.C. § 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.
2. On or about February 8, 2005, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as Rakesh Johar Saran, Johar Saran, Joe Saran and Imraan Siddiqi, **Matthew Fred Valdez**, and **Levoie Wayne Branam**, aided and abetted by one another and by others known and unknown to the Grand Jury, did unlawfully and knowingly distribute and possess with intent to distribute outside the scope of professional practice and not for a legitimate medical purpose, 1,869 pint bottles of promethazine cough syrup with codeine, a Schedule V controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(3) and 18 U.S.C. § 2.

Counts 98 through 117
Money Laundering and Aiding and Abetting
(Violations of 18 U.S.C. § 1956(a)(1)(A)(i) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set for in the Introduction to this indictment and in Counts 1 and 92.
2. On or about the dates listed below, for each of the counts listed below, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as, Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi, **Leslie Wayne Davidoff**, **David Kaiser**, and **Stacy Fred Word**, also known as Fred Word, and others known and unknown to the Grand Jury, did knowingly and willfully conduct, attempt to conduct, and cause to be conducted, financial transactions affecting interstate commerce, that is, the wire transfer of funds in the amounts listed below, from the financial institutions listed below, to an account in the name of Morris & Dickson Co. at the AmSouth Bank, Shreveport, Louisiana:

Count	Date	Financial Institution	Amount of Wire
98	05/11/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 204,046.23
99	05/24/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 392,395.37
100	05/27/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 291,801.75
101	06/09/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 611,960.34
102	06/10/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 412,000.00
103	06/23/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 816,754.34
104	07/01/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 400,000.00
105	07/22/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 370,000.00
106	07/30/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 201,918.80

Count	Date	Financial Institution	Amount of Wire
107	01/14/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 167,445.97
108	01/25/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 256,563.04
109	02/07/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 177,790.62
110	02/09/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 187,357.78
111	02/17/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 193,265.84
112	02/18/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 169,091.02
113	03/07/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 164,766.98
114	03/28/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 195,526.48
115	04/04/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 205,275.59
116	04/07/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 190,000.00
117	04/21/05	Wells Fargo Bank N.A., Arlington, Texas	\$ 186,232.25

which involved the proceeds of a specified unlawful activity, that is, conspiracy to commit health care, mail and wire fraud, and the sale and distribution of controlled substances as set forth in Counts 1 and 92, respectively, with the intent to promote the carrying on of the specified unlawful activity, and while conducting and attempting to conduct, and causing to be conducted, such financial transactions, knew that the property involved, represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(I) and 2.

Count 118 through 122
Money Laundering and Aiding and Abetting
(Violations of 18 U.S.C. § 1956(a)(1)(A)(I) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set for in the Introduction to this indictment and in Counts 1 and 92.

2. On or about the dates listed below, for each of the counts listed below, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as, Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi, **Leslie Wayne Davidoff**, **David Kaiser**, and **Stacy Fred Word**, also known as, Fred Word, and others known and unknown to the Grand Jury, did knowingly and willfully conduct, attempt to conduct, and cause to be conducted, financial transactions affecting interstate commerce, that is, the wire transfer of funds in the amounts listed below, from accounts at the financial institutions listed below, to an account in the name of The Harvard Drug Group at National City Bank, Allen Park, Michigan:

Count	Date	Financial Institution	Amount of Wire
118	08/19/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 25,909.47
119	08/26/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 50,000.00
120	08/30/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 30,509.00
121	09/17/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 9,700.00
122	11/30/04	Frost National Bank, Arlington, Texas	\$ 15,000.00

which involved the proceeds of a specified unlawful activity, that is, conspiracy to commit health care, mail and wire fraud, and the sale and distribution of controlled substances as set forth in Counts 1 and 92, respectively, with the intent to promote the

carrying on of the specified unlawful activity, and while conducting and attempting to conduct, and causing to be conducted, such financial transactions, knew that the property involved, represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(I) and 2.

Count 123 through 136
Money Laundering and Aiding and Abetting
(Violations of 18 U.S.C. § 1956(a)(1)(A)(I) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set for in the Introduction to this indictment and in Counts 1 and 92.

2. On or about the dates listed below, for each of the counts listed below, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as, Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi, and **Stacy Fred Word**, also known as Fred Word, and others known and unknown to the Grand Jury, did knowingly and willfully conduct, attempt to conduct, and cause to be conducted, financial transactions affecting interstate commerce, that is, the wire transfer of funds in the amounts listed below, from the financial institutions listed below, to an account in the name of Anda Inc., at Wachovia Bank, N.A., Florida:

Count	Date	Financial Institution	Amount of Wire
123	09/09/20	J.P. Morgan Chase Bank, Arlington, Texas	\$ 96,796.68
124	10/14/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 50,155.45
125	11/16/04	J.P. Morgan Chase Bank, Arlington, Texas	\$ 77,477.45
126	12/30/04	Frost National Bank, Arlington, Texas	\$ 97,710.35
127	01/05/05	Frost National Bank, Arlington, Texas	\$ 82,000.00
128	02/16/05	Wells Fargo National Bank, N. A., Arlington, Texas	\$ 75,000.00
129	02/25/05	Wells Fargo National Bank, N.A., Arlington, Texas	\$ 75,000.00
130	03/09/05	Wells Fargo National Bank, N.A., Arlington, Texas	\$ 100,000.00
131	03/16/05	Wells Fargo National Bank, N.A., Arlington, Texas	\$ 125,000.00
132	03/24/05	Wells Fargo National Bank, N.A., Arlington, Texas	\$ 100,000.00

Count	Date	Financial Institution	Amount of Wire
133	04/08/05	Wells Fargo National Bank, N.A., Arlington, Texas	\$ 100,000.00
134	04/19/05	Wells Fargo National Bank, N.A., Arlington, Texas	\$ 100,000.00
135	05/02/05	Wells Fargo National Bank, N.A., Arlington, Texas	\$ 100,000.00
136	05/11/05	Wells Fargo National Bank, N.A., Arlington, Texas	\$ 100,000.00

which involved the proceeds of a specified unlawful activity, that is, conspiracy to commit health care, mail and wire fraud, and the sale and distribution of controlled substances as set forth in Counts 1 and 92, respectively, with the intent to promote the carrying on of the specified unlawful activity, and while conducting and attempting to conduct, and causing to be conducted, such financial transactions, knew that the property involved, represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(I) and 2.

Count 137 through 146
Money Laundering and Aiding and Abetting
(Violations of 18 U.S.C. § 1956(a)(1)(A)(I) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set for in the Introduction to this indictment and in Counts 1 and 92.

2. On or about the dates listed below, for each of the counts listed below, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as, Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi, **Leslie Wayne Davidoff**, **David Kaiser**, and **Stacy Fred Word**, also known as Fred Word, and others known and unknown to the Grand Jury, did knowingly and willfully conduct, attempt to conduct, and cause to be conducted, financial transactions affecting interstate commerce, that is, the wire transfer of funds in the amounts listed below, from the financial institutions listed below, to an account in the name of H. D. Smith Wholesale at Bank One N.A., now known as J.P. Morgan Chase Bank, Arlington, Texas:

Count	Date	Financial Institution	Amount of Wire
137	10/18/04	J..P. Morgan Chase Bank, Arlington, Texas	\$ 33,000.00
138	12/22/04	Frost National Bank, Arlington, Texas	\$ 37,144.62
139	01/03/05	Frost National Bank, Arlington, Texas	\$ 37,805.13
140	01/06/05	Frost National Bank, Arlington, Texas	\$ 38,823.00
141	01/18/05	Frost National Bank, Arlington, Texas	\$ 40,000.00
142	01/19/05	Frost National Bank, Arlington, Texas	\$ 37,000.00
143	01/27/05	Frost National Bank, Arlington, Texas	\$ 43,000.00
144	02/08/05	Wells Fargo Bank, N.A. Arlington, Texas	\$ 50,360.61

145	02/25/05	Wells Fargo Bank, N.A. Arlington, Texas	\$ 50,637.92
146	03/01/05	Wells Fargo Bank, N.A. Arlington, Texas	\$ 48,000.00

which involved the proceeds of a specified unlawful activity, that is, conspiracy to commit health care, mail and wire fraud, and the sale and distribution of controlled substances as set forth in Counts 1 and 92, respectively, with the intent to promote the carrying on of the specified unlawful activity, and while conducting and attempting to conduct, and causing to be conducted, such financial transactions, knew that the property involved, represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(I) and 2.

Count 147 through 158
Money Laundering and Aiding and Abetting
(Violations of 18 U.S.C. § 1956(a)(1)(A)(I) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set for in the Introduction to this indictment and in Counts 1 and 92.

2. On or about the dates listed below, for each of the counts listed below, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as, Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi, and **Sherman Ted Solomon**, and others known and unknown to the Grand Jury, did knowingly and willfully conduct, attempt to conduct, and cause to be conducted, financial transactions affecting interstate commerce, that is, the wire transfer of funds in the amounts listed below, from Bank of America, New York, New York, to an account in the name of Infinity Services, Inc. at Wells Fargo National Bank, Arlington, Texas:

Count	Date	Amount of Wire
147	02/17/05	\$ 21,586.50
148	03/10/05	\$ 19,597.80
149	03/24/05	\$ 19,583.70
150	03/31/05	\$ 19,467.00
151	04/21/05	\$ 22,579.90
152	04/21/05	\$ 19,334.50
153	05/05/05	\$ 26,282.80
154	05/12/05	\$ 28,210.00
155	05/26/05	\$ 29,558.60

Count	Date	Amount of Wire
156	06/16/05	\$ 57,344.24
157	06/30/05	\$ 32,877.00
158	07/21/05	\$ 53,094.90

which involved the proceeds of a specified unlawful activity, that is, conspiracy to commit health care, mail and wire fraud, and the sale and distribution of controlled substances as set forth in Counts 1 and 92, respectively, with the intent to promote the carrying on of the specified unlawful activity, and while conducting and attempting to conduct, and causing to be conducted, such financial transactions, knew that the property involved, represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(I) and 2.

Count 159 through 169
Money Laundering and Aiding and Abetting
(Violations of 18 U.S.C. § 1956(a)(1)(A)(I) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set for in the Introduction to this indictment and in Counts 1 and 92.

2. On or about the dates listed below, for each of the counts listed below, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as, Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi, and **Steven Rosner**, and others known and unknown to the Grand Jury, did knowingly and willfully conduct, attempt to conduct, and cause to be conducted, financial transactions affecting interstate and foreign commerce, that is, the wire transfer of funds in the amounts listed below, from the financial institutions listed below, to an account in the name of Infinity Services Group, Inc. at Wells Fargo National Bank, Arlington, Texas:

Count	Date	Financial Institution	Wire Amount
159	04/19/05	RBC Centura Bank, Palm Beach Gardens, Florida	\$ 60,223.10
160	04/27/05	RBC Centura Bank, Palm Beach Gardens, Florida	\$ 54,866.50
161	05/04/05	RBC Centura Bank, Palm Beach Gardens, Florida	\$ 108,742.73
162	05/12/05	RBC Centura Bank, Palm Beach Gardens, Florida	\$ 96,216.99
163	05/25/05	Bank of Cyprus, Nicosia, Cyprus	\$ 65,998.93
164	06/08/05	Bank of Cyprus, Nicosia, Cyprus	\$ 69,997.89
165	06/14/05	RBC Centura Bank, Palm Beach Gardens, Florida	\$ 90,350.63
166	06/21/05	RBC Centura Bank, Palm Beach Gardens, Florida	\$ 110,304.88
167	06/29/05	Bank of Cyprus, Nicosia, Cyprus	\$ 156,752.67

Count	Date	Financial Institution	Wire Amount
168	07/07/05	RBC Centura Bank, Palm Beach Gardens, Florida	\$ 87,474.90
169	07/20/05	Bank of Cyprus, Nicosia, Cyprus	\$ 74,632.79

which involved the proceeds of a specified unlawful activity, that is, conspiracy to commit health care, mail and wire fraud, and the sale and distribution of controlled substances as set forth in Counts 1 and 92, respectively, with the intent to promote the carrying on of the specified unlawful activity, and while conducting and attempting to conduct, and causing to be conducted, such financial transactions, knew that the property involved, represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(I) and 2.

Counts 170 through 174
Money Laundering and Aiding and Abetting
(Violations of 18 U.S.C. § 1956(a)(1)(A)(I) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction to this indictment and in Counts 1 and 92.

2. On or about the dates listed below, for each of the counts listed below, in the Northern District of Texas and elsewhere, defendants, **Rakesh Jyoti Saran**, also known as, Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi, and **Gil Lozano**, and others known and unknown to the Grand Jury, did knowingly and willfully conduct, attempt to conduct, and cause to be conducted, financial transactions affecting interstate commerce, that is, the wire transfer of funds in the amounts listed below, from Coconut Grove Bank, Miami, Florida, to an account in the name of Infinity Services, Inc. at Wells Fargo National Bank, Arlington, Texas:

Count	Date	Amount of Wire
170	05/10/05	\$ 18,977.60
171	05/26/05	\$ 16,945.08
172	05/26/05	\$ 13,339.02
173	06/02/05	\$ 19,211.08
174	06/02/05	\$ 19,166.74

which involved the proceeds of a specified unlawful activity, that is, conspiracy to commit health care, mail and wire fraud, and the sale and distribution of controlled substances as set forth in Counts 1 and 92, respectively, with the intent to promote the carrying on of the specified unlawful activity, and while conducting and attempting to

conduct, and causing to be conducted, such financial transactions, knew that the property involved, represented the proceeds of some form of unlawful activity.

In violation of 18 U.S.C. §§ 1956(a)(1)(A)(I) and 2.

Counts 175 through 180
Engaging in Monetary Transaction in Property
Derived From Specified Unlawful Activity
(Violations of 18 U.S.C. §§ 1957(a) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.
2. On or about the dates set forth below, in the Northern District of Texas, defendant, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, aided and abetted by others known and unknown to the Grand Jury, did knowingly engage and attempt to engage in monetary transactions, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, derived from specified unlawful activity, namely the conspiracy to commit health care, the crimes of mail and wire fraud, and the conspiracy to distribute controlled substances, each such monetary transaction constituting a separate count of this indictment:

Count	Date	Transaction Amount	Description of Transaction
175	02/01/02	\$34,735.84	Saran purchased a 2002 Honda Odyssey, VIN: 2HKRL18782H552616, with cashier's check number 142778001, dated 02/01/2002, issued by Chase Bank, with remitter, Johar Saran.
176	02/27/03	\$38,189.21	Saran purchased a 2003 Lexus LX470, VIN: JTHHT00W733529184 with cashier's check drawn on Compass Bank, dated 02/01/03, check number 4866300886, remitters, Johar and a person known to the Grand Jury.

Count	Date	Transaction Amount	Description of Transaction
177	03/25/03	\$83,329.84	Saran purchased a 2003 BMW 760Li, VIN: WBAGN83413DK10193, with cashier's check, number 3280005526, remitter, Johar Saran.
178	02/26/05	\$44,460.54	Saran purchased a 2005 Honda Odyssey, VIN: 5FNRL38815B059805, by cashier's check, number 0217402070, dated 02/28/05, issued by Wells Fargo Bank, N.A.
179	03/11/05	\$18,000.00	Saran purchased a 2005 Honda Accord, VIN: 1HGCM55165A010938, in the name of a person known to the Grand Jury.
180	03/22/05	\$22,096.06	Saran purchased a 2002 Acura RL, VIN number: JH4KA96592C007073, in the name of Cherie Word , with cashier's check numbered 18992, dated 03/21/05, issued by Southwest Securities Bank, Arlington, Texas.

Each in violation of 18 U.S.C. §§ 1957(a) and 2.

Counts 181 through 195
Engaging in Monetary Transaction in Property
Derived From Specified Unlawful Activity
(Violations of 18 U.S.C. § 1957(a) and 2)

1. The Grand Jury adopts, realleges, and incorporates by reference all the allegations set forth in the Introduction of this indictment.
2. On or about the dates set forth below, in the Northern District of Texas, defendants, **Matthew Fred Valdez**, and **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, aided and abetted by each other and by others known and unknown to the Grand Jury, did knowingly engage and attempt to engage in monetary transactions, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, derived from specified unlawful activity, namely the conspiracy to commit health care, the crimes of mail and wire fraud, and the conspiracy to distribute controlled substances, each such monetary transaction constituting a separate count of this indictment:

Count	Date	Transaction Amount	Description of Transaction
182	02/28/05	\$26,789.05	Valdez purchased cashiers check number 18731 from Southwest Securities Bank, Arlington, Texas.
183	03/09/05	\$20,000.00	Valdez purchased cashiers check number 18838 from Southwest Securities Bank, Arlington, Texas.
184	03/21/05	\$22,096.06	Valdez purchased cashiers check number 18992 from Southwest Securities Bank, Arlington, Texas.

Count	Date	Transaction Amount	Description of Transaction
185	03/23/05	\$14,400.00	Valdez purchased cashiers check number 19041 from Southwest Securities Bank, Arlington, Texas.
186	03/28/05	\$16,046.61	Valdez purchased cashiers check number 19081 from Southwest Securities Bank, Arlington, Texas.
187	03/30/05	\$19,565.04	Valdez purchased cashiers check number 19104 from Southwest Securities Bank, Arlington, Texas.
188	04/01/05	\$28,386.93	Valdez purchased cashiers check number 19156 from Southwest Securities Bank, Arlington, Texas.
189	04/07/05	\$50,000.00	Valdez purchased cashiers check number 19237 from Southwest Securities Bank, Arlington, Texas.
190	04/14/05	\$44,000.00	Valdez purchased cashiers check number 19343 from Southwest Securities Bank, Arlington, Texas.
191	04/15/05	\$56,000.00	Valdez purchased cashiers check number 19352 from Southwest Securities Bank, Arlington, Texas.
192	04/15/05	\$25,000.00	Valdez purchased cashiers check number 19366 from Southwest Securities Bank, Arlington, Texas.
193	04/22/05	\$17,240.79	Valdez purchased cashiers check number 19467 from Southwest Securities Bank, Arlington, Texas.
194	04/29/05	\$12,410.00	Valdez purchased cashiers check number 19564 from Southwest Securities Bank, Arlington, Texas.
195	05/03/05	\$41,077.97	Valdez purchased cashiers check number 19590 from Southwest Securities Bank, Arlington, Texas.

Each in violation of 18 U.S.C. §§ 1957 (a) and 2.

Count 196
Forfeiture Allegation
(18 U.S.C. § 982(a)(7); 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461)

Upon conviction of the offense alleged in Count 1 of this Indictment, the defendants, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, **Stacy Fred Word**, also known as Fred Word, **David Kaiser**, **Leslie Wayne Davidoff**, also known as Les Davidoff, **Cherie Ann Word**, also known as Cherie Word, **Ayesha Siddiqui**, also known as Ayesha Siddiqi, **Margie Molina**, **George Schmidt**, **Matthew Fred Valdez**, **Levoie Wayne Branam**, **Sameer A. Sayed**, **Winston Anthony Williams**, **Arron Kyle Woodcock**, **Heather Rachelle Elliott**, **Gaston Blanchet, Jr.**, **Sherman Ted Solomon**, **Alliance Pharmacy Services, Inc.**, **AMS Pharmaceuticals Group, Inc.**, **Carrington Health Care System, Inc.**, **Dalamar Services, Inc.**, **East Pointe Pharmacy Services, Inc.**, **Everest Services, Inc.**, **Infiniti Services Group, Inc.**, **Med-Care Infusion Services, Inc.**, **National Executive Management, Inc.**, **Orion Pharmacy, Inc.**, **Precision Pharmacy Services, Inc.**, **Premium Pharmacy Services, Inc.**, **Quantum Infusion, Inc.**, **Reliance Pharmaceutical, Inc.**, **Southwest Infusion, Inc.**, **SWS Pharmacy Services, Inc.**, **Texas Home Infusion, L.L.C.**, **Tri-Phasic Pharmacy, Inc.**, **Trinity Infusion Services, Inc.**, and **Trinity Pharmacy Services, Inc.** shall forfeit to the United States the following:

- (1) pursuant to 18 U.S.C. § 982(a)(7), any property, real or personal, constituting or derived from, directly or indirectly, the gross proceeds traceable to the commission of the offense; and

- (2) pursuant to 18 U.S.C. 981(a)(1)(c) combined with 28 U.S.C. § 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

The above-referenced property subject to forfeiture (specific to each defendant, as noted below) includes, but is not limited to, the following:

Personal Property

1. One 2001 Ford Explorer, VIN 1FMZU63E41ZA35591
[Sought from **Wayne Branam**].
2. One 2000 Toyota Camry, VIN 4T1BG28K9YU698601
[Sought from **David Kaiser**].
3. One 2002 Honda Odyssey, VIN 2HKRL18782H552616
[Sought from **Rakesh Jyoti Saran**].
4. One 2003 BMW 760Li, VIN WBAGN83413DK10193
[Sought from **Rakesh Jyoti Saran**].
5. One 2003 Lexus LX7, VIN JTJHT00W933533396
[Sought from **Rakesh Jyoti Saran**].
6. One 2005 Honda Accord, VIN 1HGCMS5165A010938
[Sought from **Rakesh Jyoti Saran**].
7. One 2005 Honda Odyssey, VIN 5FNRL38815B059805
[Sought from **Rakesh Jyoti Saran**].
8. One 2003 Honda Odyssey, VIN 5FNRL18973B031811
[Sought from **Ayesha Siddiqui**].
9. One 2002 Honda, VIN 1HGCG56752A123625
[Sought from **Matthew Fred Valdez**].
10. One 2001 Lexus RX300, VIN JTJGF10U410107265
[Sought from **Stacy Fred Word**].

11. One 2002 Acura, VIN JH4KA96592C007073
[Sought from **Cherie A. Word** and **Rakesh Jyoti Saran**].

Real Property

1. The real property and all buildings, appurtenances, and improvements located at 2320 Panorama, Arlington, Texas, more particularly described as Lot 6 and 7, Block 2, of Phase I And Phase II, The Estates On Rush Creek, An Addition To The City Of Arlington, Tarrant County, Texas, According To The Plat Thereof Recorded In Volume A, Page 2168, of The Plat Records Of Tarrant County, Texas. Now Known As Lot 6R, Block 2, The Estates On Rush Creek, An Addition To The City Of Arlington, Tarrant County, Texas, According To The Plat Thereof Recorded In Volume A, Page 6877, Of The Plat Records Of Tarrant County, Texas.
[Sought from **Rakesh Jyoti Saran**].
2. The real property and all buildings, appurtenances, and improvements located at 1491 N. Walnut Creek and 1501 N. Walnut Creek, Mansfield, Texas, more particularly described as a Tract of Land Located In The Henry McGehee Survey, Abstract No. 998, City of Mansfield, Tarrant County, Texas, specifically the approximately 6 acres with 2 houses purchased on April 15, 2005 from Ricky F. Ford and Candice S. Ford property by Dan and Cherie Word.
[Sought from **Rakesh Jyoti Saran** and **Cherie Ann Word**].
3. The real property and all buildings, appurtenances, and improvements located at 904 Red Oak, Mansfield, Texas, more particularly described as Lot 1R, Block 6, the Oaks, an addition to the City of Mansfield, Tarrant County, Texas, according to the Revised Plat Recorded in Volume 388-194, Page 88, Plat Records, Tarrant County, Texas.
[Sought from **Rakesh Jyoti Saran** and **Cherie Ann Word**].
4. The real property and all buildings, appurtenances, and improvements located at 13072 Water Point Boulevard, Windermere, Orange County, Florida, more particularly described as Lot 29 of Waterford Pointe Phase II, Replat, according to the plat thereof as recorded in plat book 34, page(s) 125, of the public records of Orange County, Florida.
[Sought from **Sherman Ted Solomon**].
5. The real property and all buildings, appurtenances, and improvements located at 7450 S.W. 64th Street, Miami, Dade County, Florida, more particularly described as Section 26 Township 54 Range 40 (0.89 Acres, more or less) the west 131.23 feet of the east 393.69 feet of north ½ of northwest 1/4 of southwest 1/4 less north

35 feet for the street or 16203-2592 1293-1 ying and being in Miami Dade County Florida.

[Sought from **Gil Lozano**].

6. The real property and all buildings, appurtenances, and improvements located at 771 Marine Drive, Boca Raton, Palm Beach County, Florida, more particularly described as Lot 4, Block 1, Blue Inlet, according to the plat thereof, recorded in plat book 26, page 5, of the public records of Palm Beach County, Florida.

[Sought from **Steven Rosner**].

Money Judgment

\$200,000,000.00, plus any interest and proceeds traceable to that amount (this aggregate sum of money represents, at the least, the gross proceeds of the offense).

Substitute Assets

Pursuant to 21 U.S.C. § 853(p), if any of the above-described real and/or personal property, as a result of any act or omission of the previously-mentioned defendant(s), cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America intends to seek forfeiture of any other property of the previously-mentioned defendant(s) up to the value of the above-described property subject to forfeiture.

Count 197
Forfeiture Allegation
(18 U.S.C. § 982(a)(7))

Upon conviction of any of the offense alleged in Counts 2 through 5 of this Indictment, the defendant, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, shall forfeit to the United States the following:

- (1) pursuant to 18 U.S.C. § 982(a)(7), any property, real or personal, constituting or derived from, directly or indirectly, the gross proceeds traceable to the commission of the respective offense.

The above-referenced property subject to forfeiture (as to all Counts, unless otherwise noted) includes, but is not limited to, the following:

Personal Property

1. One 2002 Honda Odyssey, VIN 2HKRL18782H552616
[Sought from **Rakesh Jyoti Saran**].
2. One 2003 BMW 760Li, VIN WBAGN83413DK10193
[Sought from **Rakesh Jyoti Saran**].
3. One 2003 Lexus LX7, VIN JTJHT00W933533396
[Sought from **Rakesh Jyoti Saran**].
4. One 2005 Honda Accord, VIN 1HGCMS5165A010938
[Sought from **Rakesh Jyoti Saran**].
5. One 2005 Honda Odyssey, VIN 5FNRL38815B059805
[Sought from **Rakesh Jyoti Saran**].
6. One 2002 Acura, VIN JH4KA96592C007073
[Sought from **Cherie A. Word and Rakesh Jyoti Saran**].

Money Judgment (as to each Count)

Count 2: \$50,000,000.00, plus any interest and proceeds traceable to that amount
(this aggregate sum of money represents, at the least, the gross proceeds of the offense).

Count 3: \$25,000,000.00, plus any interest and proceeds traceable to that amount
(this aggregate sum of money represents, at the least, the gross proceeds of the offense).

Count 4: \$45,000,000.00, plus any interest and proceeds traceable to that amount
(this aggregate sum of money represents, at the least, the gross proceeds of the offense).

Count 5: \$88,000,000.00, plus any interest and proceeds traceable to that amount
(this aggregate sum of money represents, at the least, the gross proceeds of the offense).

Substitute Assets

Pursuant to 21 U.S.C. § 853(p), if any of the above-described real and/or personal property, as a result of any act or omission of the previously-mentioned defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America intends to seek forfeiture of any other property of the previously-mentioned defendant up to the value of the above-described property subject to forfeiture.

Count 198
Forfeiture Allegation
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461)

Upon conviction of any of the offenses alleged in Counts 6 through 66 of this Indictment, the defendant, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, shall forfeit to the United States the following:

- (1) pursuant to 18 U.S.C. 981(a)(1)(c) combined with 28 U.S.C. § 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the respective offense.

Substitute Assets

Pursuant to 21 U.S.C. § 853(p), if any of the above-described real and/or personal property, as a result of any act or omission of the previously-mentioned defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America intends to seek forfeiture of any other property of the previously-mentioned defendant up to the value of the above-described property subject to forfeiture.

Count 199
Forfeiture Allegation
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461)

Upon conviction of any of the offenses alleged in Counts 67 through 91 of this Indictment, the defendant, **Rakesh Jyoti Saran**, also known as Johar Rakesh Saran, Johar Saran, Joe Saran, John Saran, and Imraan Siddiqi, shall forfeit to the United States the following:

- (1) pursuant to 18 U.S.C. 981(a)(1)(c) combined with 28 U.S.C. § 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to the respective offense;

The above-referenced property subject to forfeiture (as to each Count as noted below) includes, but is not limited to, the following:

Money Judgment (as to each Count)

The amount of money listed in the Count.

Substitute Assets

Pursuant to 21 U.S.C. § 853(p), if any of the above-described real and/or personal property, as a result of any act or omission of the previously-mentioned defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America intends to seek forfeiture of any other property of the previously-mentioned defendant up to the value of the above-described property subject to forfeiture.

Count 200
Forfeiture Allegation
(21 U.S.C. § 853(a))

Upon conviction of any of the offenses alleged in Counts 92 through 97 of this Indictment, the defendants alleged in the respective Count, including **Rakesh Jyoti Saran**, also known as Rakesh Johar Saran, Johar Saran, Joe Saran and Imraan Siddiqi, **David Kaiser**, **Leslie Wayne Davidoff** also known as Les Davidoff, **Matthew Fred Valdez**, **Levoie Wayne Branam**, **Sameer A. Sayed**, **Winston Anthony Williams**, **Arron Kyle Woodcock**, **Heather Rachelle Elliott**, **David Thane Muns**, **Orion Pharmacy, Inc.**, **Tri-Phasic Pharmacy, Inc.**, **Trinity Pharmacy Services, Inc.**, **Gaston Blanchet, Jr.**, **Sherman Ted Solomon**, **Gil Lozano**, and **Steven Rosner**, shall forfeit to the United States the following:

- (1) pursuant to 21 U.S.C. § 853(a)(1), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the respective offense; and
- (2) pursuant to 21 U.S.C. § 853(a)(2), any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the respective offense.

The above-referenced property subject to forfeiture (specific to each defendant, as noted below) includes, but is not limited to, the following:

Personal Property

1. One 2001 Ford Explorer, VIN 1FMZU63E41ZA35591
[Sought from **Wayne Branam**].

2. One 2000 Toyota Camry, VIN 4T1BG28K9YU698601
[Sought from **David Kaiser**].
3. One 2002 Honda Odyssey, VIN 2HKRL18782H552616
[Sought from **Rakesh Jyoti Saran**].
4. One 2003 BMW 760Li, VIN WBAGN83413DK10193
[Sought from **Rakesh Jyoti Saran**].
5. One 2003 Lexus LX7, VIN JTJHT00W933533396
[Sought from **Rakesh Jyoti Saran**].
6. One 2005 Honda Accord, VIN 1HGCMS5165A010938
[Sought from **Rakesh Jyoti Saran**].
7. One 2005 Honda Odyssey, VIN 5FNRL38815B059805
[Sought from **Rakesh Jyoti Saran**].
8. One 2003 Honda Odyssey, VIN 5FNRL18973B031811
[Sought from **Ayesha Siddiqui**].
9. One 2002 Honda, VIN 1HGCG56752A123625
[Sought from **Matthew Fred Valdez**].
10. One 2001 Lexus RX300, VIN JTJGF10U410107265
[Sought from **Stacy Fred Word**].
11. One 2002 Acura, VIN JH4KA96592C007073
[Sought from **Cherie A. Word and Rakesh Jyoti Saran**].

Real Property

1. The real property and all buildings, appurtenances, and improvements located at 2320 Panorama, Arlington, Texas, more particularly described as Lot 6 and 7, Block 2, of Phase I And Phase II, The Estates On Rush Creek, An Addition To The City Of Arlington, Tarrant County, Texas, According To The Plat Thereof Recorded In Volume A, Page 2168, of The Plat Records Of Tarrant County, Texas. Now Known As Lot 6R, Block 2, The Estates On Rush Creek, An Addition To The City Of Arlington, Tarrant County, Texas, According To The Plat Thereof Recorded In Volume A, Page 6877, Of The Plat Records Of Tarrant County, Texas.
[Sought from **Rakesh Jyoti Saran**].
2. The real property and all buildings, appurtenances, and improvements located at 1491

N. Walnut Creek and 1501 N. Walnut Creek, Mansfield, Texas, more particularly described as a Tract of Land Located In The Henry McGehee Survey, Abstract No. 998, City of Mansfield, Tarrant County, Texas, specifically the approximately 6 acres with 2 houses purchased on April 15, 2005 from Ricky F. Ford and Candice S. Ford property by Dan and Cherie Word.

[Sought from **Rakesh Jyoti Saran** and **Cherie Ann Word**].

3. The real property and all buildings, appurtenances, and improvements located at 904 Red Oak, Mansfield, Texas, more particularly described as Lot 1R, Block 6, the Oaks, an addition to the City of Mansfield, Tarrant County, Texas, according to the Revised Plat Recorded in Volume 388-194, Page 88, Plat Records, Tarrant County, Texas.

[Sought from **Rakesh Jyoti Saran** and **Cherie Ann Word**].

4. The real property and all buildings, appurtenances, and improvements located at 13072 Water Point Boulevard, Winderemere, Orange County, Florida, more particularly described as Lot 29 of Waterford Pointe Phase II, Replat, according to the plat thereof as recorded in plat book 34, page(s) 125, of the public records of Orange County, Florida.

[Sought from **Sherman Ted Solomon**].

5. The real property and all buildings, appurtenances, and improvements located at 7450 S.W. 64th Street, Miami, Dade County, Florida, more particularly described as Section 26 Township 54 Range 40 (0.89 Acres, more or less) the west 131.23 feet of the east 393.69 feet of north ½ of northwest ¼ of southwest ¼ less north 35 feet for the street or 16203-2592 1293-1 ying and being in Miami Dade County Florida.

[Sought from **Gil Lozano**].

6. The real property and all buildings, appurtenances, and improvements located at 771 Marine Drive, Boca Raton, Palm Beach County, Florida, more particularly described as Lot 4, Block 1, Blue Inlet, according to the plat thereof, recorded in plat book 26, page 5, of the public records of Palm Beach County, Florida.

[Sought from **Steven Rosner**].

Money Judgment (as to all defendants in Count 92)

The amount of money equal to the proceeds obtained from the offense.

Substitute Assets

Pursuant to 21 U.S.C. § 853(p), if any of the above-described real and/or personal

property, as a result of any act or omission of the previously-mentioned defendant(s), cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America intends to seek forfeiture of any other property of the previously-mentioned defendant(s) up to the value of the above-described property subject to forfeiture.

Count 201
Forfeiture Allegation
(18 U.S.C. § 982(a)(1))

Upon conviction of any of the offenses alleged in Counts 98 through 195 of this Indictment, the defendants alleged in the respective Count, including defendants **Rakesh Jyoti Saran**, also known as, Rakesh Johar Saran, Johar Saran, Joe Saran, and Imraan Siddiqi, **Leslie Wayne Davidoff**, **David Kaiser**, **Stacy Fred Word**, **Sherman Ted Solomon**, **Steven Rosner**, and **Gil Lozano** shall forfeit to the United States the following:

- (1) pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the respective offense or any property traceable to such property.

The above-referenced property subject to forfeiture (specific to each defendant, as noted below) includes, but is not limited to, the following:

Personal Property

1. One 2001 Ford Explorer, VIN 1FMZU63E41ZA35591
[Sought from **Wayne Branam**].
2. One 2000 Toyota Camry, VIN 4T1BG28K9YU698601
[Sought from **David Kaiser**].
3. One 2002 Honda Odyssey, VIN 2HKRL18782H552616
[Sought from **Rakesh Jyoti Saran**].
4. One 2003 BMW 760Li, VIN WBAGN83413DK10193
[Sought from **Rakesh Jyoti Saran**].
5. One 2003 Lexus LX7, VIN JTJHT00W933533396
[Sought from **Rakesh Jyoti Saran**].
6. One 2005 Honda Accord, VIN 1HGCMS5165A010938
[Sought from **Rakesh Jyoti Saran**].

7. One 2005 Honda Odyssey, VIN 5FNRL38815B059805
[Sought from **Rakesh Jyoti Saran**].
8. One 2003 Honda Odyssey, VIN 5FNRL18973B031811
[Sought from **Ayesha Siddiqui**].
9. One 2002 Honda, VIN 1HGCG56752A123625
[Sought from **Matthew Fred Valdez**].
10. One 2001 Lexus RX300, VIN JTJGF10U410107265
[Sought from **Stacy Fred Word**].
11. One 2002 Acura, VIN JH4KA96592C007073
[Sought from **Cherie A. Word and Rakesh Jyoti Saran**].

Real Property

1. The real property and all buildings, appurtenances, and improvements located at 2320 Panorama, Arlington, Texas, more particularly described as Lot 6 and 7, Block 2, of Phase I And Phase II, The Estates On Rush Creek, An Addition To The City Of Arlington, Tarrant County, Texas, According To The Plat Thereof Recorded In Volume A, Page 2168, of The Plat Records Of Tarrant County, Texas. Now Known As Lot 6R, Block 2, The Estates On Rush Creek, An Addition To The City Of Arlington, Tarrant County, Texas, According To The Plat Thereof Recorded In Volume A, Page 6877, Of The Plat Records Of Tarrant County, Texas.
[Sought from **Rakesh Jyoti Saran**].
2. The real property and all buildings, appurtenances, and improvements located at 1491 N. Walnut Creek and 1501 N. Walnut Creek, Mansfield, Texas, more particularly described as a Tract of Land Located In The Henry McGehee Survey, Abstract No. 998, City of Mansfield, Tarrant County, Texas, specifically the approximately 6 acres with 2 houses purchased on April 15, 2005 from Ricky F. Ford and Candice S. Ford property by Dan and Cherie Word.
[Sought from **Rakesh Jyoti Saran and Cherie Ann Word**].
3. The real property and all buildings, appurtenances, and improvements located at 904 Red Oak, Mansfield, Texas, more particularly described as Lot 1R, Block 6, the Oaks, an addition to the City of Mansfield, Tarrant County, Texas, according to the Revised Plat Recorded in Volume 388-194, Page 88, Plat Records, Tarrant County, Texas.
[Sought from **Rakesh Jyoti Saran and Cherie Ann Word**].
4. The real property and all buildings, appurtenances, and improvements located at

13072 Water Point Boulevard, Winderemere, Orange County, Florida, more particularly described as Lot 29 of Waterford Pointe Phase II, Replat, according to the plat thereof as recorded in plat book 34, page(s) 125, of the public records of Orange County, Florida.

[Sought from **Sherman Ted Solomon**].

5. The real property and all buildings, appurtenances, and improvements located at 7450 S.W. 64th Street, Miami, Dade County, Florida, more particularly described as Section 26 Township 54 Range 40 (0.89 Acres, more or less) the west 131.23 feet of the east 393.69 feet of north ½ of northwest 1/4 of southwest 1/4 less north 35 feet for the street or 16203-2592 1293-1 ying and being in Miami Dade County Florida.

[Sought from **Gil Lozano**].

6. The real property and all buildings, appurtenances, and improvements located at 771 Marine Drive, Boca Raton, Palm Beach County, Florida, more particularly described as Lot 4, Block 1, Blue Inlet, according to the plat thereof, recorded in plat book 26, page 5, of the public records of Palm Beach County, Florida.

[Sought from **Steven Rosner**].

Money Judgment (as all defendants in each Count)

The amount of money listed in the Count.

Substitute Assets

Pursuant to 21 U.S.C. § 853(p), if any of the above-described real and/or personal property, as a result of any act or omission of the previously-mentioned defendant(s), cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America intends to seek forfeiture of any other property of the previously-mentioned defendant(s) up to the value of the above-described property subject to forfeiture.

A TRUE BILL:

Sharon Shoutm
FOREPERSON

RICHARD B. ROPER
UNITED STATES ATTORNEY

B M
WILLIAM C. MCMURREY
Assistant United States Attorney
State of Texas Bar No. 13811100
1100 Commerce Street, 3rd Floor
Dallas, Texas 75242
214.659.8600

C H
CANDINA HEATH
Assistant United States Attorney
State of Texas Bar No. 09347450

J D
JOHN DELAGARZA
Assistant United States Attorney
State of Texas Bar No. 00796455

K P
KIMBERLY PRIEST
Assistant United States Attorney
State of Texas Bar No. 24027753